

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<b>D. G. Sweigert, Pro Se Counter-Plaintiff</b>  <b>-against-</b>  <b>Jason Goodman, Pro Se Counter-Defendant</b>	<b>PRO SE</b>  <b>21-cv-10878-AT-JLC</b>  <b>District Judge Analisa Torres</b>  <b>Magistrate Judge James L. Cott</b>
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**DEFENDANT’S CONDITIONAL COUNTER CLAIM AGAINST JASON GOODMAN  
(COUNTER DEFENDANT)**

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The *pro se* Defendant-Counter Plaintiff (undersigned) files these papers as conditional upon a finding of personal jurisdiction by this Court upon the undersigned. *Wafios Machinery Corporation v. Nucoil Industries Co., Ltd.*, 03 Civ. 9865 (RWS) (S.D.N.Y. Jul. 21, 2004). If no personal jurisdiction is established against the undersigned by this Court these papers should be considered moot. Conditional ANSWER filed concurrently with these papers.

February 9, 2023



**D. G. SWEIGERT PRO SE DEFENDANT, C/O  
PMB 13339, 514 Americas Way,  
Box Elder, SD 57719**

**DEFENDANT, COUNTER PLAINTIFF, SWEIGERT'S COUNTER CLAIM**

*Pro se* Defendant D. G. Sweigert, who does not waive his right to challenge this Court's personal jurisdiction over him, now responds as a conditional Counter-Plaintiff and asserts his COUNTER CLAIM as follows:

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NOW COMES THE PRO SE COUNTER PLAINTIFF D. G. SWEIGERT to provide this Honorable Court with a conditional counter claim complaint for damages in excess of \$75,001.00 that describes Article III damages.

**INTRODUCTION**

***Goodman and Webb as Russian Propogandists***

1. The U.S. District Court for the Michigan Eastern District (M.I.E.D.) and the Southern District of New York (S.D.N.Y.) are all too familiar with Jason Goodman ("Goodman") and his former room-mate George Webb Sweigert ("Webb"). Both are pro-Kremlin social media mouthpieces (openly pro-Russia concerning the conflict with the Ukraine) and have ties to suspected state operated Russian disinformation operations. Both are experts at social media hoax news stories and smear campaigns. Both are Russian propogandists and use propaganda techniques against their enemies accordingly. Both have appeared extensively on the Alex Jones conspiracy network INFOWARS.

2. Both were present at the U.S. Capitol building January 6, 2021 cheerleading insurrectionists on social media and were predominantly featured in social media podcasts at the U.S. Capitol on 1/6/2021. On several occasions CrowdSource the Truth sponsored joint

podcasts with the conspiracy channel, hosted by Alex Jones known as “INFOWARS” (caveat: a former INFOWARS reporter, Joseph Randall Biggs, was arrested on 1/20/2021 for his involvement in the 1/06/2021 Capitol insurgency [ <https://www.justice.gov/opa/page/file/1357251/download> ]).

3. Likewise, Mr. Jones has appeared on the Counter Defendant’s Multimedia System Design, Inc. (M.S.D.I.’s) d/b/a 21<sup>st</sup> Century 3D podcast known as CrowdSourceThe Truth channels 2 and 3 on YouTube.COM for the purposes of peddling far-right extremism and radicalization.

4. Goodman, whose former wife is Russian-Ukrainian, makes extensive appearances on Russian owned state media “SPUTNIK RADIO” with his “lifelong friend”, SPUTNIK full-time employee Lee Stranahan of Sioux Falls, South Dakota. Stranahan admits he “is paid by the Russians” and is a close friend of Brad Parscale, the former director of social media operations for the TRUMP FOR PRESIDENT campaign.

5. Webb, who in the recent past has paid Stranahan \$5,000.00 in two (2) credit card transactions, has completed a 2022 six-month tour of Eastern Europe as a “headliner” to appear in pro-Russian social media podcasts to push the conspiracy theory that the invasion of the Ukraine by Russia was justified to secure “biological weapons labs”. ( <https://twitter.com/RealGeorgeWebb1> )Webb has broadcasted his video content from Poland, Romania and Slovenia to name a few of the former Iron Curtain satellites of Russia. Webb has been extensively quoted by media outlets linked to the Chinese Communist Party. ( <https://www.globaltimes.cn/content/1183658.shtml> )

6. Like Webb, Goodman pushes conspiracy theories in an Internet “CLOUD” of a dozen social media properties owned, controlled or operated by Goodman’s fictional d/b/a “21<sup>st</sup>

Century 3D” an assumed named assigned by the Secretary of State for New York State (NYS) to Goodman’s Multimedia Systems Design, Inc. (M.S.D.I.). M.S.D.I. owns the trademark “CrowdSource The Truth”. Goodman’s social media broadcasts, to include the “Russian biolab security” narrative have included extensive LiveStream interviews with Stranahan and John Mark Dougan (an American fugitive embedded within active Russian combat military forces fighting in the Ukraine). Goodman’s CrowdSource The Truth Internet CLOUD (Counter Defendant Goodman’s CLOUD enterprise encompassing Twitter accounts, BitChute, Rumble, Odysee, Patreon, YouTube, SubscribeStar, etc.) distributes COVID-19 antivax and 2020 stolen election narratives to incite anti-government viewers to become paid subscribers using their credit cards. Goodman’s broadcasts are designed to create false reports of crime to inflame cyber mobs to attack Goodman’s enemies and settle personal scores, like an employee of the M.I.E.D. Court Richard Loury, or the U.S. Department of Homeland Security (D.H.S.) Nina Jankowicz, or of the EMMY Awards Adam Sharp.

7. Goodman, acting as an agent for the CrowdSource the Truth (CSTT) CLOUD enterprise, has stated many times in video broadcasts that the CSTT CLOUD enterprise must be protected from persons like the Counter Plaintiff who represent a “threat” to the CSTT CLOUD enterprise. To this end the CLOUD enterprise sponsors a “COUNTER LAWFARE REPORT”.

***Goodman’s re-litigation of Michigan claims in New York***

8. Recently the Counter Plaintiff, “Webb’s” brother, was named as a new defendant in a year-old sham legal action brought by Goodman in the S.D.N.Y. against Webb and a third-party Christopher E. Bouzy. *Goodman v. Bouzy*, et. al. Case No. 1: 21-cv-10878-AT-JLC, S.D.N.Y.,

Hon. Analisa Torres presiding.<sup>1</sup> Christopher E. Bouzy is an apparent social media expert that is employed by law firms for his expertise in automated smear campaigns.

9. In an attempt to re-litigate issues settled in the Michigan M.I.E.D. Court, Goodman has recently docketed an overlapping and redundant amended complaint in that action that conflicts with the jurisdiction of the M.I.E.D. Goodman filed an amended complaint 1/17/2023 in *Goodman v. Bouzy* (appearing as ECF doc. 100, 1/17/23 in this action) which seeks to re-litigate the lion's share of orders that provide the gravamen of jurisdiction to the M.I.E.D. and not the S.D.N.Y.. (For example see M.I.E.D. 2:22-cv-10002-GAD-KGA *Sweigert v. Goodman*, Hon. Gershwin A. Drain, presiding; *note* ORDER 22-cv-10002 (E.D. Mich. Apr. 1, 2022)). Meanwhile, Webb has done likewise.

10. George Webb is also attempting to re-litigate the M.I.E.D. Court's findings in an action in the Northern District of Georgia (his amended complaint attached in the accompanying exhibits annex). See *Sweigert v. C.N.N.*, 1:22-CV-02946-SEG. Re-litigation is another common tactic for Russian propagandists like Webb and Goodman who use their sham lawsuits to re-write history as they discuss their legal cases on social media with thousands of viewers. Otherwise they have nothing to talk about.

11. Goodman has formally alleged, and presumably expects to litigate, Michigan matters in the S.D.N.Y. concerning M.I.E.D. Court employee Richard Loury, who should be in jail according to Goodman, for committing criminal acts of forgery as defined by the laws of the State of Michigan (a conspiracy to file forged court documents). Goodman has even visited the Detroit Police Department and the Detroit field office of the Federal Bureau of Investigation in

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<sup>1</sup> Filed in the S.D.N.Y. as docket ECF no. 100, 1/18/2023.

an attempt to have Loury and the Counter Plaintiff arrested. In Goodman's own words (from his amended complaint in *Goodman v. Bouzy*): (ECF no. 100).

28. Non-party Richard Loury ("Loury") is a clerk at the U.S. District Court in the Eastern District of Michigan ("MIED").

Filed as ECF doc. 100, 1/17/2023

Evidence presented to the MIED court is likely to prove that Sweigert fraudulently submitted filings on his brother Webb's behalf, practicing law without a license in the State of Michigan in violation of Michigan Legislature - Section 600.916 and for the express purpose of entangling Goodman in more vexatious litigation. On July 20, 2021, Goodman filed an Amicus Curiae brief in support of defendant CNN's motion to dismiss which presented evidence that is likely to prove that Webb and Sweigert conspired with a clerk of the court, Loury, to cause a fraudulent document to be filed on the docket, in violation of 18 U.S. Code § 1343 attributed to Webb, but authored by Loury, and outside the normal procedure of the MIED Court's Pro Se Electronic Filing website. (See Case 2:20-cv-12933-GAD-KGA ECF No. 20)

AMENDED COMPLAINT FOR FRAUD, DEFAMATION, ABUSE OF PROCESS, CIVIL CONSPIRACY, AND RACKETEERING  
- 23

Filed as ECF doc. 100, 1/17/2023

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Enterprise. Defendants calculated their actions specifically to harm Goodman or otherwise should have known his injuries were a foreseeable result of their conspiracy.

81. Defendants Webb and Sweigert entered into a civil conspiracy with non-party Loury in violation of 18 U.S. Code §§ 1343 and 1513 when they caused a fraudulent document to be filed with the Court in the Eastern District of Michigan.

Filed as ECF doc. 100, 1/17/2023

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On September 21, 2021, presiding Judge Gershwin Drain issued a notice of motion hearing set for December 16, 2021. The order was sent by U.S. Postal Service to Goodman, summoning Goodman to the hearing (*See* Case 2:20-cv-12933-GAD-KGA ECF No. 24). On November 1, 2021, an order replacing the in-person motion hearing with a December 20, 2021 Zoom telephonic hearing was issued (*See* Sweigert v CNN Case 2:20-cv-12933-GAD-KGA ECF No. 28). On December 14, 2021, another order was issued rescheduling the motion hearing for an in-person hearing. (*See* Sweigert v CNN Case 2:20-cv-12933-GAD-KGA ECF No. 34). Goodman traveled to MIED as ordered at his own expense. Only hours after arriving, one day before the scheduled hearing, an email was sent by Teresa McGovern from Judge Drain's chambers stating in part, "The Court is adjourning tomorrow's hearing. The Court will reach out at a later date to reschedule this hearing."

Filed as ECF doc. 100, 1/17/2023

Michigan at his own expense to attend a hearing directly related to Defendants' fraudulent acts at the orders of Judge Gershwin Drain and additional costs and fees.

56. Defendant Sharp violated 18 U.S. Code § 1343 when he transmitted a false

Filed as ECF doc. 100, 1/17/2023

14 53. Defendants caused a fraudulent pleading to be transmitted to the U.S. District  
15 Court for the MIED in violation of 18 U.S. Code § 1343, 18 U.S. Code § 1503, and 18  
16 U.S. Code § 1513 when Loury altered the date of a pro se pleading filed with the Court  
17 on June 21, 2021, attributed to Webb but authored by Loury at Sweigert's direction.

18 54. In furtherance of their fraud, Defendants brought legal action and submitted  
19 pleadings over the internet violating 18 U.S. Code § 1343 when Webb sued alleging  
20 privileged statements made in an Amicus Curiae brief were defamatory but provided no  
21 evidence to refute the well-founded allegations of document forgery and fraud.  
22

23 55. Plaintiff suffered special damages as a proximate cause of Defendant's fraudulent  
24 representations and malicious actions when he was compelled to travel to Detroit,  
25  
26

27 AMENDED COMPLAINT FOR FRAUD, DEFAMATION, ABUSE OF PROCESS, CIVIL  
28 CONSPIRACY, AND RACKETEERING

- 35

Filed as ECF doc. 100, 1/17/2023

12. This instant Counter Claim seeks primarily to address relevant issues, described above, that apply to this Court's jurisdiction and carve-out those M.I.E.D. redundant accusations which Goodman has attempted to re-litigate in the S.D.N.Y.

***Goodman's Pattern and Practice***

13. Make no mistake, the lives of the Counter Plaintiff, presumably Loury and others are impacted by Goodman's vicious social media attacks launched via his proxy companies. It is instructive to note that Goodman directed a cyber mob in May 2022 to hound and harangue a pregnant federal civil servant employed by the D.H.S. named Nina Jankowicz (an expert in Russian propaganda and author of the book "*How To Lose The Information War, Russia, Fake News and the Future of Conflict*", published by I.B. Tauris, London, 2020) who endured at least two (2) late night telephone calls by Goodman, who broadcasted the calls to thousands on his social media podcast shows. This included rebroadcasts on the notorious Alex Jones controlled *Banned.Video* conspiracy platform. The Court will recall the M.I.E.D. admonishing Goodman for his telephone calls to M.I.E.D. Court staff and spouses at their homes during off business hours (usually at 11 p.m.). (*See Sweigert v. Goodman*, 22-CV-1002, Show Cause hearing March 4, 2022, ORDER of 2/11/2022). Soon after the Goodman phone calls and cyber mob video that featured Jankowicz and the Counter Plaintiff (published on "battleplan.news" and "banned.video", Alex Jones affiliated media properties) Jankowicz was forced to quit her D.H.S. job, which gave Stranahan an opportunity to praise Goodman's antics.



**Jason Goodman**  
@JGoodman\_CSTT



Will Twitter allow me to tweet this from InfoWars?



infowars.com

DisINFO DIVA Nina Jankowicz Reveals She's Been Working ...  
Host of Crowdsourcethe Truth reaches out to Ministry of  
Truth czar for interview.

5:15 PM · May 12, 2022 · Twitter for iPad



**Lee Stranahan** @stranahan · 11h



Russia state-affiliated media

Congratulations to @JGoodman\_CSTT Nina Jankovich, a VERY big scalp.

1

2

21



**Jason Goodman** @JGoodman\_CSTT · 11h



Thank you Lee. If people haven't yet seen the report...



battleplan.news

Disinfo Diva or Dangerous Double Agent: Who is N...  
Is Nina Jancowicz merely a frustrated Broadway  
showtunes songstress or is she a dangerous ...

1

5

16



**Disinfo Diva or Dangerous Double Agent: Who is Nina Jankowicz?**

25,228 views · May 18, 2022

25 Share Download

Is Nina Jancowicz merely a frustrated Broadway showtunes songstress or is she a dangerous subversive operative working to undermine the U.S. government from within? In this report, Jason Goodman of Crowdsource the Truth reveals unimpeachable evidence indicating Nina may actually work for the Zelenskyy government, has received numerous payments to a shadowy LLC from non-U.S. NGOs and has failed to register under the foreign agent registration act. Hear Nina herself, and her colleagues at The Brookings Institution, The Wilson Center and others as Goodman teases out admissions that almost certainly lead to the immediate dissolution of the Orwellian Disinformation Governance Board. Produced by CrowdSourceTheTruth.com

<https://banned.video/watch?id=62852a24d04a760673700d2c>

<https://battleplan.news/watch?id=62852a24d04a760673700d2c>

The screenshot shows a video player interface. At the top, there is a search bar and a navigation menu. The main content area displays the title "Disinfo Diva or Dangerous Double Agent: Who is Nina Jankowicz?" and the author "Author: Dave Sweigert, M.Sci., CISSP, CISA, PMP". Below the title, there is an "ABSTRACT" section with the text: "Private organizations would be well advised to be aware of the involvement of National Guard cyber warfare units in responding to attacks infrastructure. Increased interaction with Guard units may be ap entities concerned with community-wide cyber resiliency." To the right of the abstract is a small video thumbnail showing a man speaking. Below the abstract, there is a "Background" section with the text: "CROWDSOURCE THE TRUTH This year the passage of the National... accomplish political obje Chinese Eagle Union Has one example of a 'Cyber M". At the bottom of the video player, there is a "Special Reports" section with the text: "Is Nina Jancowicz merely a frustrated Broadway showtunes songstress or is she a dangerous subversive operative working to undermine the U.S. government from within? In".

The screenshot shows a tweet from Jason Goodman (@JGoodman\_CSTT). The tweet text reads: "#ICYMI last night's exposé revealed stunning facts about @wiczipedia and who she actually works for. She must be prosecuted for FARA and other violations [subscribestar.com/posts/608458](https://subscribestar.com/posts/608458) [patreon.com/posts/disinfo-...](https://patreon.com/posts/disinfo-...)". Below the text is a video thumbnail showing a person in a dark setting, possibly a laboratory or office, with a logo that says "A30B" and a stylized "N" symbol. The tweet is displayed on a Twitter interface with a sidebar on the left showing navigation icons.

## **PARTIES**

14. **NON-PARTY MULTIMEDIA SYSTEM DESIGN, INC. (M.S.D.I.)**. Goodman is fond of playing legal flipflop between two (2) entities; (a) as the sole owner of M.S.D.I., which has obtained an assumed name certificate as (b) 21<sup>st</sup> Century 3D in New York State (see Twitter handle @21C3D).

15. At all times alleged herein Goodman is/was exercising and discharging his duties as a representative of M.S.D.I. / 21<sup>st</sup> Century 3D (aka Agent Goodman) engaged in a for profit enterprise known as CrowdSource The Truth (U.S. Trademark), an interoperable phrase with 21<sup>st</sup> Century 3D, and/or M.S.D.I. (aka CLOUD enterprise). As stated in his S.D.N.Y. amended complaint, Goodman mistakenly expects these corporate fictions to provide him immunity from litigation under the Communications Decency Act, 47 U.S. Code § 230.

## **CROWDSOURCE THE TRUTH - Trademark Information**

By **Multimedia System Design, Inc**



The CROWDSOURCE THE TRUTH trademark was assigned a Serial Number #87752970 – by the United States Patent and Trademark Office (USPTO). Trademark Serial Number is a Unique ID to identify the CROWDSOURCE THE TRUTH mark in USPTO. The CROWDSOURCE THE TRUTH mark is filed in the category of Education and Entertainment Services . The legal correspondent for CROWDSOURCE THE TRUTH trademark is MULTIMEDIA SYSTEM DESIGN, INC, 252 7TH AVENUE, 6S NEW YORK, NY 10001 . The current status of the CROWDSOURCE THE TRUTH filing is **REGISTERED**.

Based on Multimedia System Design, Inc, the CROWDSOURCE THE TRUTH trademark is used in the following business: Providing on-line videos featuring news in the nature of current event reporting, not downloadable .

<https://www.trademarkelite.com/trademark/trademark-detail/87752970/CROWDSOURCE-THE-TRUTH>

16. M.S.D.I. has been sued as a legal entity in the S.D.N.Y. action *The National Academy of Television Arts and Sciences, Inc. et al v. Multimedia System Design, Inc.*, 20-cv-07269-VEC-OTW, Hon. Valerie E. Caproni, presiding.

17. In *NATAS vs. MSDI* presiding judge Caproni remarked M.S.D.I. “*traffics in wild conspiracy theories*,” (id., 2021 WL 3271829, at \*1 (S.D.N.Y. July 30, 2021)). Judge Caproni also observed at an October 25, 2021 show cause hearing for Goodman’s alleged contempt of court, “*this sounds like Q-Anon*”. Note: Goodman, using either M.S.D.I. or 21<sup>st</sup> Century 3D, prefers to use coded references such as “*the 17<sup>th</sup> letter of the alphabet*” on his social media conspiracy theory podcasts and not the actual term Q-Anon.

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**Department of State**  
**Division of Corporations**

Entity Assumed Name History

[Return to Results](#) [Return to Search](#)

Entity Details

<b>ENTITY NAME:</b> MULTIMEDIA SYSTEM DESIGN, INC.	<b>DOS ID:</b> 1830828
<b>FOREIGN LEGAL NAME:</b>	<b>FICTITIOUS NAME:</b>
<b>ENTITY TYPE:</b> DOMESTIC BUSINESS CORPORATION	<b>DURATION DATE/LATEST DATE OF DISSOLUTION:</b>
<b>SECTION OF LAW:</b> 402 BCL - BUSINESS CORPORATION LAW	<b>ENTITY STATUS:</b> ACTIVE
<b>DATE OF INITIAL DOS FILING:</b> 06/21/1994	<b>REASON FOR STATUS:</b>
<b>EFFECTIVE DATE INITIAL FILING:</b> 06/21/1994	<b>INACTIVE DATE:</b>
<b>FOREIGN FORMATION DATE:</b>	<b>STATEMENT STATUS:</b> PAST DUE DATE
<b>COUNTY:</b> NEW YORK	<b>NEXT STATEMENT DUE DATE:</b> 06/30/1996
<b>JURISDICTION:</b> NEW YORK, UNITED STATES	<b>NFP CATEGORY:</b>

ENTITY DISPLAY   NAME HISTORY   FILING HISTORY   MERGER HISTORY   ASSUMED NAME HISTORY

Search

Filing Date	Assumed Name	Assumed Name ID	Status	Principal Location
10/10/2002	21ST CENTURY 3D	206900	Active	
05/15/1998	MULTIMEDIA SOFTWARE DESIGN	206899	Active	

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18. In various trade journals and New York City business directories, M.S.D.I. lists business addresses at 505 8th Avenue, New York, New York 10018 and 252 7th Avenue Apartment No. 6S, New York, NY 10001, and an address designated for service of process at 208 East 51st Street, Suite 200, New York, New York 10022.

19. M.S.D.I. and/or 21<sup>st</sup> Century 3D (aka CLOUD enterprise) are vicariously liable for the acts of their Agent Goodman. Counter Defendant Goodman is also personally liable for such acts.

20. **NON-PARTY GEORGE WEBB SWEIGERT.** Webb is the former room-mate of Goodman. For at least the Spring and Summer of 2017 the pair were inseparable “YouTube stars”. The Court will recall that Webb initiated litigation in the M.I.E.D. for stories produced by the Cable News Network and C.B.S. 60 Minutes that featured Webb’s views on “patient zero” of the COVID-19 outbreak. (*See Webb v CNN* Case 2:20-cv-12933-GAD-KGA and M.I.E.D. 2:22-cv-10002-GAD-KGA *Sweigert v. Goodman*). Webb has filed another lawsuit in Georgia to re-litigate the findings of the M.I.E.D. Court (see exhibits annex). That case has thankfully been recently dismissed in the Northern District of Georgia.

21. **COUNTER PLAINTIFF D. G. SWEIGERT.** At all times described herein, the Counter Plaintiff is a *pro se* non-attorney layman that has suffered Article III injuries and damages and seeks redress in the federal courts. Counter Plaintiff has suffered the dilution of his career in the emergency medical services and the emergency management field as a direct result of the activities of the Defendant. Counter Plaintiff is a private figure.

22. The Counter Plaintiff, an Honorable Discharged U.S. Air Force veteran, is a licensed Emergency Medical Technician, a former member of the Livermore-Pleasanton Fire Department Community Emergency Response Team (LPCERT), a licensed ham radio operator, a 2018 graduate of Las Positas College (LPC) (with honors) with a degree in Network Security (attended LPC under a Veterans Educational Assistance Program), who became a Certified Ethical Hacker (U.S. Department of Defense cyber defense program (DoD 8570.01-Manual)) and is a California Emergency Management Specialist as certified by the Governor’s Office of

Emergency Services (CalOES). The Counter Plaintiff has self-published a dozen white papers on cyber security of critical infrastructure as well as the book “*Certified Ethical Hackers Field Operations Guide*”. The Counter Plaintiff’s private plan for launching an emergency wilderness medical training academy has been severely obstructed by the Counter Defendant’s social media smears.

### **JURISDICTION**

23. This is a diversity case with at least \$75,001.00 in damages due to the Article III damages suffered at the hands of the Counter Defendant’s CSTT CLOUD enterprise and their Agent Goodman, to include damage to professional reputation, business disparagement, intentional infliction of emotional distress and other damages. Additional jurisdiction is provided by: copyright infringement under 17 U.S.C. § 101 et seq. , 17 U.S.C. § 1201(a) & (b) (Section 1201 of the Digital Millennium Copyright Act (DCMA)), violations of Lanham Act, 11 U.S.C. § 1125(a). Section 1125(a), violations of the Federal Trade Commission Act, 15 U.S.C. § 45(a), which prohibits “unfair or deceptive acts or practices in or affecting commerce” and ancillary state pendant claims such as defamation, invasion of privacy by false light, defamation *per se*, slander *per se*, libel *per se*, defamation by implication, intentional infliction of emotional distress (I.I.E.D.).

24. Agent Goodman’s purposeful availment of the resources in Michigan has been manifested by at least three (3) for profit business trips to benefit the CLOUD enterprise in Detroit, Michigan. These trips were made by Agent Goodman to discharge his duties as a M.S.D.I. / 21<sup>st</sup> Century 3D CLOUD enterprise agent to produce profit-centered content for the subscriber video service. M.S.D.I. and/or 21<sup>st</sup> Century 3D, aka CLOUD enterprise, are vicariously liable for the acts of Agent Goodman while in the State of Michigan.

25. Only three months ago, Goodman, while discharging his corporate responsibilities, committed the tort of defamation with actual malice (ironically Goodman cites the legal definition of defamation *per se* in the video) in the State of Michigan (Section 600.705) when he, using M.S.D.I. / 21<sup>st</sup> Century 3D resources, released the below cited video broadcast which reiterates the supposed criminal forgery misconduct of Richard Louri and the Counter Plaintiff.

26. After filing maliciously fictitious police reports, Goodman positions himself in front of the Detroit Police Department in the video to describe his meetings with police about Louri / Counter Plaintiff and their “criminal acts”.



#### Charles Ortel is CLOSING IN – Detroit Schlock City

Crowdsource the Truth 8 • 1.4K views • Streamed 3 months ago

America's Democrat led cities are crumbling, Charles joins me to discuss the latest crises. subscribe to Crowdsource the Truth on Rumble - <https://rumble.com/user/csthetruth> subscribe to Crowdsour...

<https://www.youtube.com/watch?v=HBi6JDsTfYg>



Charles Ortel is CLOSING IN – Detroit Schlock City

Crowdsource the Truth 8  
2.75K subscribers

Subscribed

126

Share



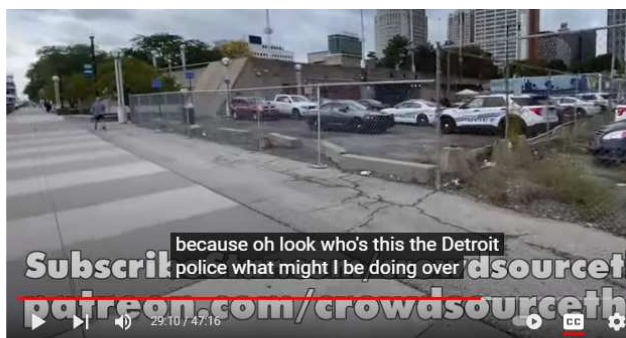
Charles Ortel is CLOSING IN – Detroit Schlock City

Crowdsource the Truth 8  
2.75K subscribers

Subscribed

126

Share



Charles Ortel is CLOSING IN - Detroit Schlock City



Crowdsourcethe Truth 8  
2.75K subscribers

Subscribed

126



Share



Charles Ortel is CLOSING IN - Detroit Schlock City



Crowdsourcethe Truth 8  
2.75K subscribers

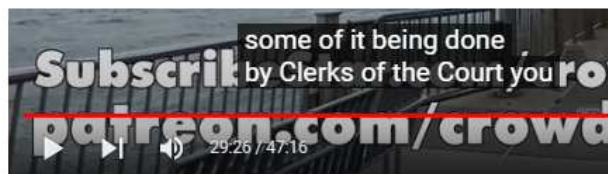
Subscribed

126

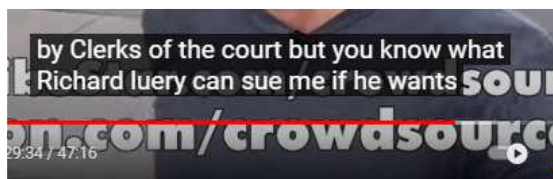


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Charles Ortel is CLOSING IN - Detroit Schlock City



CLOSING IN - Detroit Schlock City



CLOSING IN - Detroit Schlock City

<https://www.youtube.com/watch?v=HBi6JDsTfYg>

27. For similar antics in abusing New York Police Department (N.Y.P.D.) resources at the entrance of Twitter Headquarters in New York City on 11/1/2022, Goodman was issued a disorderly conduct citation (see below).

### GENERAL ALLEGATIONS

#### *The Counter Defendants' CrowdSource The Truth CLOUD Enterprise*

28. The CrowdSource The Truth CLOUD (aka Defendants CLOUD enterprise) is a for profit enterprise that is promoted as a “fact checking service” that is engaged in “conducting investigations” and gathering evidence for “criminal prosecutions”. This not true. By Goodman’s own words his CSTT CLOUD supposed business is apparently some sort of satire and/or parody social media show that broadcasts on Internet sites. This “business” relies on many non-revenue producing social media sites such as Rumble, BitChute, YouTube to distribute general public relations and awareness for the profit producing sites known as

Patreon, SubScribeStar and Odysee. <https://www.subscribestar.com/crowdsourcethetruth> ,  
<https://www.patreon.com/crowdsourcethetruth> ,  
<https://odysee.com/@Crowdsourcethetruth:d?view=membership>

29. According to Goodman, the legal entities M.S.D.I. / 21<sup>st</sup> Century 3D provide a legal firewall that enjoys immunity from litigation under the Communications Decency Act, 47 U.S. Code § 230 (C.D.A.) (but, sometimes Goodman claims these entities are “dormant”). This legal stand is incorrect, as it is the social media platform providers (Rumble, YouTube, Patreon, etc.) that have access to immunity under C.D.A., not Goodman’s content pushed into the CSTT CLOUD enterprise. Claims arising from decisions like Twitter’s decision to remove Goodman’s 21<sup>st</sup> Century 3D (@21C3D) account from the platform are immune from liability under § 230(c)(1).

preceding paragraphs as it fully stated herein.

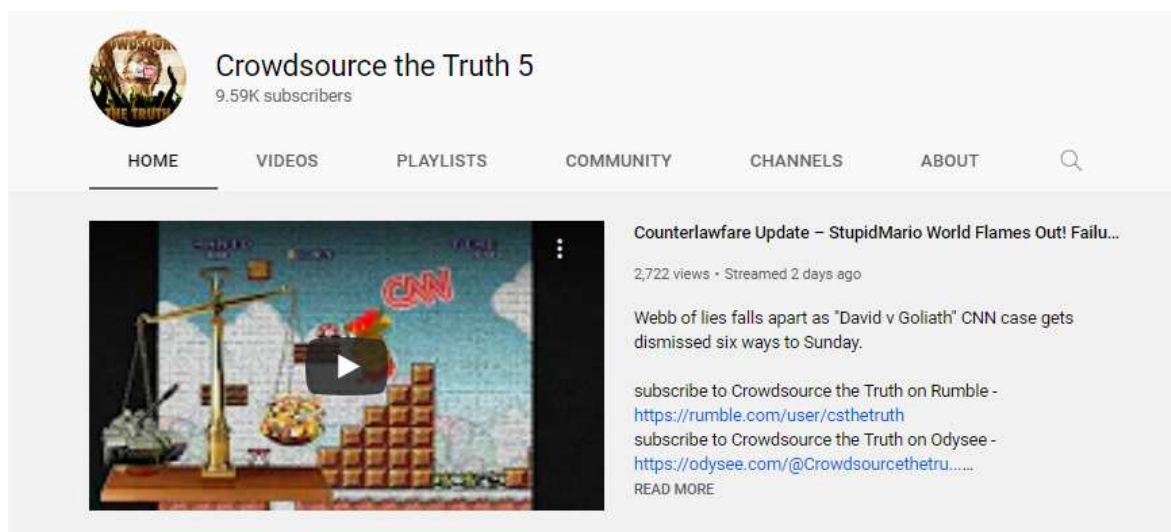
79. Defendants Sweigert, Sharp, ATAS, and Esquenet entered into a civil conspiracy when they agreed to create a pretext under which they intended to sue a corporation owned by Goodman for an internet post made by Goodman in his personal capacity in violation of 47 U.S. Code § 230 and with the express intent of harming Goodman and extorting him into ceasing news broadcasts during the 2020 Presidential election.

Filed as ECF doc. 100, 1/17/2023

1. Goodman routinely uses M.S.D.I. / 21<sup>st</sup> Century 3D to violate the terms of service of social media providers while discharging his duties as an agent for M.S.D.I. and 21<sup>st</sup> Century 3D which have led to the suspension and/or termination of several social media accounts controlled by M.S.D.I. and/or 21<sup>st</sup> Century 3D. To this end, Goodman maintains proxy accounts to work around account bans and terminations (aka ban evasion) on a myriad of

electronic Internet servers, collectively known as the “CrowdSource The Truth CLOUD” (aka the Defendants CLOUD enterprise, the collective of inauthentic social media proxy accounts co-mingled with supposed “legitimate” accounts”). Caveat: Counter Plaintiff is aware that the Counter Defendant presently maintains four (4) Twitter accounts: <https://twitter.com/csthetruth> , <https://twitter.com/cheburashka1964> , <https://twitter.com/GHenryDickface> and <https://twitter.com/counterspoliat1> .

30. Meanwhile, Goodman uses a two staged approach to receive monies from unsuspecting Michigan and New York consumers. There is a (1) public component (13 social media properties accessible by the general public with no user authentication) and (2) the private Internet component accessible after user authentication on a subscriber / membership basis. The public broadcasts (stage one) serve as an advertising (false advertising) and a promotional device (analogous to a book cover or book wrapper), while the for-profit subscriber content is private (stage two) (analogous to viewing the actual book content) after a recurring credit card payment schedule is established (e.g. \$10.00 a month). The private (stage two) video service allows Goodman to slander and defame his targets behind a so-called credit card “paywall”.



<https://www.youtube.com/channel/UC2lcaABsK-5OfYb6P9nP3Q>

31. YOUTUBE.COM, RUMBLE.COM and other publicly accessible social media sites (stage one) are used by M.S.D.I., 21<sup>st</sup> Century 3D and/or Goodman to solicit (false advertising) memberships to credit card holders (stage two) with an enticement to obtain authenticated user accounts on PATREON, ODYSSEE and SUBSCRIBESTAR (stage two) Internet sites.



<https://www.youtube.com/watch?v=qTuXPFoZERk>

### *Crowdsourcethe Truth 5*

9.59K subscribers

**SUBSCRIBE**

*Webb of lies falls apart as "David v Goliath" CNN case gets dismissed six ways to Sunday.*

*subscribe to Crowdsourcethe Truth on Rumble - <https://rumble.com/user/csthetruth>*

*subscribe to Crowdsourcethe Truth on Odysee - <https://odysee.com/@Crowdsourcethetruth>...*

*Please sponsor the Crowdsourcethe Truth Counterlawfare Fund at*

*<http://www.crowdsourcethetruth.com>.*

*Become a sponsor & enjoy exclusive content on SubscribeStar & Patreon*

*Get a FREE 3-Day trial at <http://www.subscribe.com/crowdsou...>*

*<http://www.patreon.com/crowdsourcethe...> <http://paypal.me/crowdsourcethetruth>*

*Visit <http://www.crowdsourcethetruth.com>*

<https://www.youtube.com/watch?v=qTuXPFoZERk>

### ***Unfair Trade Practices and Business Libel by the Counter Defendants' CLOUD Enterprise***

32. Whether they are public (stage one) announcements (false advertising) and private credit card (stage two) podcasts, Goodman, who with actual malice, spreads smears of criminal

conduct, mental illness, accusations of grotesque behavior, etc. against the Counter Plaintiff (and others) that are materially false to generate interest in his broadcasts.

33. New York and Michigan consumers that watch these CrowdSource The Truth CLOUD stage one enticements (false advertising) to subscribe, and who actually do subscribe with credit cards are being defrauded. These New York and Michigan consumers expect to review and watch a “fact checking service” that is fact based. Thus, when Goodman defames individuals like Loury, the Counter Plaintiff, and Jankowicz, the public assumes and expects that the allegations pushed by Goodman are true. They are not, but they do help coalesce cyber lynch mobs, or as Goodman calls them his “Cyber Militia”.

34. Commencing in July 2021 and continuously occurring to the present, Counter Defendant M.S.D.I. / 21<sup>st</sup> Century 3D’s Goodman, has maliciously published fact statements regarding a criminal conspiracy (defamation by implication) about the Counter Plaintiff.

35. According to Goodman both Sweigert brothers (aka SUPER MARIO brothers) and the federal employee Richard Loury should be prosecuted and sentenced to 14 years in prison under Michigan law (defamation *per se*). This is especially important as Michigan law, as codified in MCL 750.411a(1), makes it a crime to falsely report individuals to law enforcement agencies. The Counter Defendant enterprise’s agent Goodman knew these reports of criminal forgery to be false when reported the “SUPER MARIO BROTHERS” to the Detroit Police Department and F.B.I.

36. Below are recent examples (January 2023) of Goodman’s Twitter “tweets” via various Twitter accounts controlled by M.S.D.I. / 21<sup>st</sup> Century 3D.



<https://twitter.com/GHenryDickface/status/1588618185498296320>



<https://twitter.com/GHenryDickface/status/1588618544660742144>



<https://twitter.com/counterspoliat1/status/1609706501727465474>



<https://twitter.com/counterspoliat1/status/1609704685375737856>



<https://twitter.com/counterspoliati1/status/1609704392512372737>

37. Goodman has stated in a dozen videos that he is “protecting” the CrowdSource The Truth enterprise with the COUNTER LAWFARE REPORT. Thus, Goodman, acting as an agent for the CLOUD enterprise, makes false police reports and associated defamatory statements as part of discharging his duties as a corporate agent for the CrowdSource The Truth CLOUD enterprise.

38. Goodman, as an agent of the CSTT CLOUD enterprise and in his personal capacity, has been engaging in unfair trade practices and illegal consumer practices which have resulted in injuries and damages to the Counter Plaintiff in excess of \$75,001.00. Such damages have been caused, in part, by Goodman’s filing of maliciously fictitious police reports with the Detroit Police Department and F.B.I. about Lory and the Counter Plaintiff.

39. As the Counter Plaintiff owns certain invaluable intellectual property rights, including all rights of publicity associated with the Counter Plaintiff’s education, career reputation and professional persona. The Counter Plaintiff has published numerous white papers, articles and treatises on ethical hacking, network security, emergency management, protection of critical infrastructure, etc. To this end, prior to the Counter Defendant’s reckless attacks on Counter Plaintiff’s professional reputation, the Counter Plaintiff enjoyed a professional reputation on the Internet as a Certified Ethical Hacker and technical publisher. The Counter Plaintiff’s

name, photograph and likeness have tremendous value, in particular to the industries associated with cyber security infrastructure protection aka “network security” and “ethical hacking”, etc.

40. The Counter Defendant Goodman acting as an agent for M.S.D.I. / 21<sup>st</sup> Century 3D (CLOUD enterprise) and in his personal capacity has maliciously published materially false statements with malice concerning the professional competency and abilities of the Plaintiff who is a Certified Ethical Hacker. Goodman, acting as an authorized agent, has published a dozen social media videos accusing the Plaintiff of criminal participation in a conspiracy with Webb and Loury to docket forged legal documents in the M.I.E.D. Court.

41. According to Goodman, Counter Plaintiff’s document known as the *Certified Ethical Hackers Field Operations Manual* provides a blueprint for created illegal forged documents using Adobe Acrobat .PDF files. Such statements published by the Defendant CLOUD enterprise Agent Goodman (acting in his official and personal capacities) were made with actual malice and are of no legitimate interest to the public, rather they are part of an on-going smear campaign developed by disinformation professionals. These unprivileged statements made with actual malice of Counter Plaintiff’s supposed criminal conduct have resulted in special harm to the Plaintiff’s business, technical and professional reputation. Further, each and every time Goodman has a technical glitch with his social media podcast equipment, he is quick to implicate “that ethical hacker”, known to be the Plaintiff.



[https://twitter.com/JGoodman\\_CSTT/status/1504943754221965317?cxt=HHwWisC-1d6X0eIpAAAA](https://twitter.com/JGoodman_CSTT/status/1504943754221965317?cxt=HHwWisC-1d6X0eIpAAAA)

42. The Counter Plaintiff likeness, name, image and persona (violation of right to privacy) have been used as part of a long-term false advertising campaign since at least one year ago by a so-called “fact checking service” provided by CrowdSource The Truth to lure and entice New York and Michigan consumers to the Counter Defendant’s “pay-wall” videos available at PATREON, ODYSEE and SUBSCRIBESTAR.

43. Counter Defendant M.S.D.I. / 21<sup>st</sup> Century 3D / Agent Goodman and/or Goodman personally, have acted in an extreme and outrageous manner with actual malice to accuse the Counter Plaintiff of criminal conduct under a false advertising campaign resulting in professional disparagement.

44. The Counter Defendants Cloud enterprise (M.S.D.I. / 21<sup>st</sup> Century 3D) using Goodman’s agency have, in the preceding twelve (12) months, acted with actual malice and added a slander against the Counter Plaintiff of criminal conduct related to the publishing of a PDF court document in the M.I.E.D. action *George Webb Sweigert v. Cable News Network* (- 2:20-cv-12933-GAD-KGA).

45. The Counter Defendant (M.S.D.I. / 21<sup>st</sup> Century 3D) Goodman filed an Amicus Brief in the M.I.E.D. Court (2:20-cv-12933-GAD-KGA, *Sweigert v. CNN*, **docket 20**) which alleged fraud upon the court perpetrated Richard Loury and Sweigert. Counter Defendant Goodman using the CLOUD enterprise then used Goodman’s agency to file the Amicus brief as a fraudulent cornerstone to build a massive criminal conspiracy social media narrative that has been disseminated in dozens of video productions (defamation by implication) with actual malice.



[https://twitter.com/JGoodman\\_CSTT/status/1504954872273285126?cxt=HHwWjMC9zfKeluIpAAAA](https://twitter.com/JGoodman_CSTT/status/1504954872273285126?cxt=HHwWjMC9zfKeluIpAAAA)

46. In the two-page brief, titled BRIEF OF AMICUS CURIAE JASON GOODMAN IN SUPPORT OF DEFENDANT’S MOTION TO DISMISS, Counter Defendant Goodman explains that he “is a pro se non-attorney, non-party to this case,” then Goodman declares that he “comes now as a friend of the court to share facts and evidence Goodman alleges reveal a fraud on the court intended to affect the outcome of this case.” *Sweigert v. CNN*, Case 2:20-cv-12933-GAD-KGA ECF No. 20, PageID.244 Filed 07/20/21 Page 2 of 4.

47. Concurrently with the filing of the Amicus brief, the Counter Defendant Goodman published a public podcast with his then attorney John H. Snyder, New York City, describing corruption in the M.I.E.D.; *The Counter Lawfare Report with Attorney John Snyder – Allegations of Corruption in Federal Court*, June 30, 2021.



<https://www.youtube.com/watch?v=MVzocok1fy8>

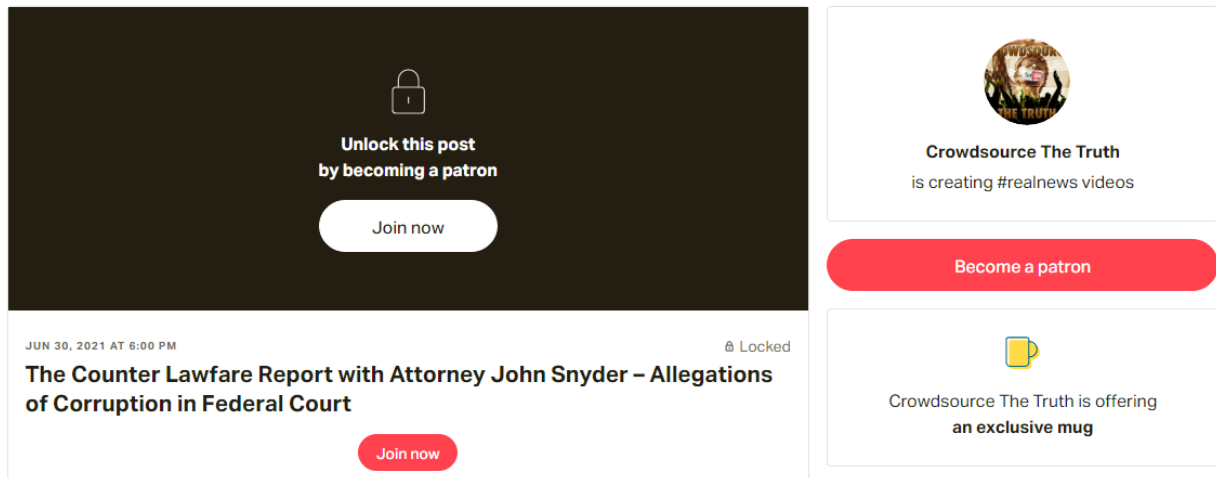
Crowdsource the Truth 5

8.95K subscribers

SUBSCRIBE

The Counter Lawfare Report returns to Crowdsource the Truth with a new legal expert. Harvard JD, tech entrepreneur and legal expert Jonathan Snyder joins me to explore allegations of corruption within the Federal Court system. This is going to be an explosive episode. Join us on SubscribeStar and Patreon.

48. Below is a representation of the privatized version of the podcast content.



<https://www.patreon.com/posts/counter-lawfare-53141470>

49. At the 10:12 time mark (from the above public video) the Defendant provides a teaser for the PATREON/SUBSCRIBESTAR privatized videos.

*Jason Goodman (10:12). Before we begin our deep dive into this stunning evidence that – I want to remind our audience this isn't proof of fraud or corruption within the federal court – but were gonna show some shocking evidence that I believe is evidence of fraud and we're going to allow the audience to make their own decision. We are going to be starting in just under five minutes at subscribestar.com slash crowdsource the truth and patreon.com slash crowdsource the truth.*



50. The YOUTUBE.COM video podcast described above is, in fact, an advertisement device to lure New York and Michigan consumers to the privatized videos on

PATREON/SUBSCRIBESTAR/ODYSEE. The public video (see above) is a tease and lure which implies criminal activity will be examined.

51. This lure and tease tactic is common amongst QAnon-based conspiracy theorists, such as Goodman (whom a federal judge (Caproni) has ruled “*traffics in wild conspiracy theories*”). The term “QAnon-based conspiracy theories” is, in the Counter Plaintiff’s view, the most succinct way of contextualizing CrowdSource The Truth broadcasts and the baseless “investigations” that promote materially false statements.

52. On December 30, 2021 the Counter Defendant’s enterprise (M.S.D.I. / 21<sup>st</sup> Century 3D) maliciously published a public video podcast, entitled, *Ghost Town NYC – Hollywood Distorter's False Statements of Fact Favor EMMY Liars & Goodbye de Blasio*, ([https://www.youtube.com/watch?v=90\\_Jtqt-JtE](https://www.youtube.com/watch?v=90_Jtqt-JtE)) , where he stated on camera:

*Jason Goodman (1:10:52) “If it wasn’t for that pesky amicus brief, because you see, that presented evidence that supports the allegation that a forged document was placed on the docket, and it raises certain questions about who might have done that. And I have a feeling, I don’t know, and we won’t know until the hearing happens, but I have a feeling, **Judge Drain called that hearing because he wants to hear details about the evidence that I presented.**” [emphasis added]*

*“And the court does have the inherent power to conduct an investigation in the case that someone’s trying to deceive them. Fraud on the court is within their power to investigate and punish people; for they got marshals there, they can arrest people, stick them in jail, and stuff, so we’ll see what happens.”*



[https://www.youtube.com/watch?v=90\\_Jtqt-JtE](https://www.youtube.com/watch?v=90_Jtqt-JtE)

53. Videos distributed via social media by the Counter Defendant’s CLOUD enterprise assert that “investigations” are conducted as a COUNTER LAWFARE initiative to **protect** the “CLOUD” from “Deep State” operatives using the legal system to quench “journalist endeavors”. COUNTER LAWFARE is another hoax and scam that is maliciously published with the intent to defraud the public in reckless disregard of the truth for deceptive purposes (see “*Crowdsorce The Truth is an Open Source Fact Checking "Truth Engine"*” at <https://www.patreon.com/crowdsourcethetruth>).

54. The intentional and fraudulent misrepresentations by Counter Defendant’s M.S.D.I. / 21<sup>st</sup> Century 3D CLOUD, with Goodman at the helm, include “investigations” into the background of individuals, like Richard Loury, to “expose” “Deep State” affiliations, and that such private “facts” are then vetted by the “crowd” for substantiation and used to claim law enforcement arrests are forthcoming after Goodman files maliciously fictitious police reports (see Detroit Police Department and Detroit F.B.I. field office meetings).

55. In violation of Michigan’s MCL 750.411a(1), Agent Goodman makes false reports to law enforcement about the “crime”, which are then featured in the broadcasts sponsored by the

Counter Defendant's CLOUD enterprise (at both stage one and stage two outlets). Goodman's objective is to "defend the CLOUD enterprise" by causing injury the target's (Loury and Counter Plaintiff) personal reputation, business reputation, emotions, status in the community, and other such special damages associated with trade / business libel, defamation *per se* and defamation *per quod*.

### SPECIFIC ALLEGATIONS

56. The CrowdSource The Truth CLOUD enterprise (21<sup>st</sup> Century 3D / M.S.D.I. with Goodman at the helm) smears human targets for reputation destruction under the guise of conducting hoax "investigations", like the accusations of a criminal forgery conspiracy within the M.I.E.D., as alleged in numerous podcasts to the public, which state that Richard Loury, the Counter Plaintiff and his brother Webb have participated in some sort of criminal forgery and fraud upon the court and face "criminal charges" (false light), see January 29,

2022, Crowdsorce the Truth livestream titled, Ghost Town NYC-Bomb Cyclone Edition

Blizzard '22. As Goodman stated in the video:

*Jason Goodman: (51:52) It's amazing the number of people who are in the professional harassment business. It's so bad the Super Mario brothers (a reference to the Sweigert brothers), I can't believe I haven't spoken about them. There's been a lot of stuff going on with them. They seem to be concerned about Detroit. Did people catch my discussion about traveling to Detroit? It was a big pain in the ass. The hearing got cancelled...hearing got cancelled and I think I, I think I know why, I don't want to say too much about it because these are ongoing things, but Super Mario brothers should be very concerned about Detroit."*

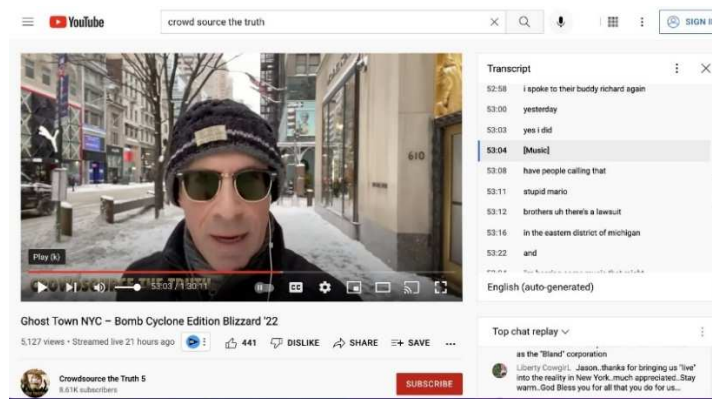
*(52:58) "I spoke to their buddy Richard again yesterday. Yes I did...have people calling that stupid Mario brothers. Uh there's a lawsuit in the Eastern District of Michigan, but there was another filing in the suit yesterday and Richard Loury (of the*

*Michigan Eastern District court staff) left his name on it. This guy's not too smart and they're going to be in a lot of trouble. I don't think they fully appreciate what's going on."*

*(54:46) "If anybody had any questions If Mr. Loury were or were not guilty, I called him up, he answered the phone. I said Richard are you all right? Your voice sounds a little rough. And he said who's this? I said, it's Jason. He said I'm okay. I said you've been with George, what's going on with that? Click. Hung up the phone. I don't know personally, is that the way an innocent guy would act?"*

*(55:53) "I think when we finally get to speak with Judge Drain in the Eastern District of Michigan, it hit with a barrel."*

57. The false light implication is that Richard Loury and the Counter Plaintiff are working in a clandestine and covert manner, relying on the blue print in the *Certified Ethical Hacker's Field Operations Guide*, to corrupt the processes of the M.I.E.D. with forged court documents. The video screenshots appear below ( <https://www.youtube.com/watch?v=7LlPmHUz7Qs> ).



58. In a "Crowdsourcethe Truth" Twitter tweet of Feb. 13, 2022, the Counter Plaintiff is identified as part of the "SUPER MARIO BROTHER". This is an example of "talk around" for the advertisement of privatized video content where actual names of individuals are masked to

the public (stage one - false advertising), but then revealed on PATREON / SUBSCRIBESTAR / ODYSEE paywall video content.



59. On January 18, 2022 the Counter Defendant's CLOUD enterprise sole owner traveled to Detroit, Michigan with the intent to attend a hearing in *Sweigert v. CNN*. As claimed by Agent Goodman in a dozen videos published since that time, while in Detroit the Agent Goodman met with a federal law enforcement special agent and the Detroit Police Department to provide false police reports about Loury/Sweigert criminal conspiracy (defamation by implication), aka SUPER MARIO brothers. Below is a public video podcast the Defendant made while in Detroit.



[https://www.youtube.com/watch?v=SSinKt\\_0PZE](https://www.youtube.com/watch?v=SSinKt_0PZE)

60. On Jan. 28, 2022 Goodman, acting as an agent for the Counter Defendant's CLOUD enterprise, maliciously published a Twitter tweet after hanging up the telephone with Richard Loury.

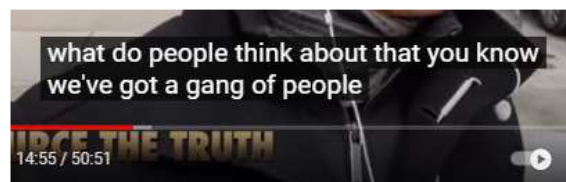


61. The above tweet makes reference to a CrowdSource The Truth CLOUD enterprise social media podcast known as the "COUNTER LAWFARE REPORT". The hoax investigations (as depicted above) are designed to promote anti-social behavior, such as cyber mob attacks,

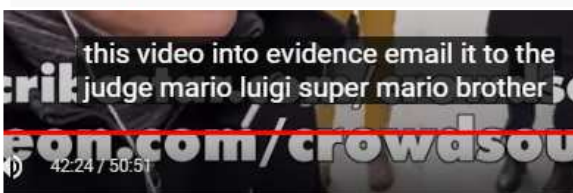
glamorization of doxing, and incitement to violence as seen with the insurrection at the U.S. Capitol on January 6, 2021.



<https://www.youtube.com/watch?v=VQAFqyoliBA>

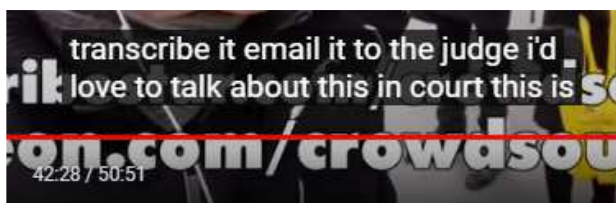


Lawfare Rages On in the Streets of New York

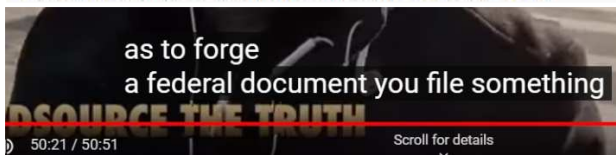


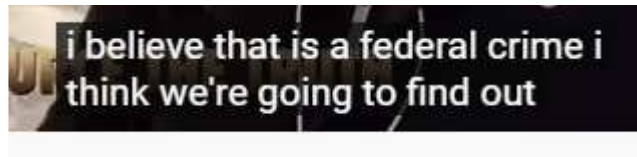
Lawfare Rages On in the Streets of New York

Above: Example of Mr. Goodman's references to Plaintiff, "Mario Luigi, Super Mario Brother"



Lawfare Rages On in the Streets of New York





## **FIRST CAUSE OF ACTION**

### **Misappropriation of Right of Publicity Against Counter Defendant**

62. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 61, inclusive, as if fully restated herein.

63. The conduct the enterprise (21<sup>st</sup> Century 3D / M.S.D.I.) via Agent Goodman, as alleged hereinabove, under the CrowdSource The Truth trademark, constitutes a knowing and unauthorized use of the Counter Plaintiff's name, likeness, photograph and name for commercial purposes, which have substantial commercial value. Counter Defendant's CLOUD enterprise used Counter Plaintiff's name, photograph, and likeness knowingly and deliberately, without the prior consent of any of the Counter Plaintiff. Counter Plaintiff has suffered actual damages as a result of Counter Defendant's CLOUD enterprise deliberate use of his names, photograph, and likeness on advertisements and other types of solicitations for goods or services (e.g. promotion of PATREON subscriptions). Counter Defendant's CLOUD enterprise engaged in outrageous conduct, carried on with willful and conscious disregard of the rights of Counter Plaintiff. Each such use was unequivocally and directly for purposes of advertising or selling or soliciting purchases of subscription services by Goodman / M.S.D.I. / 21<sup>st</sup> Century 3D such that prior consent was required.

64. As set forth more fully above, Counter Defendant's CLOUD enterprise is based around harassment campaigns against the Counter Plaintiff and other like situated individuals (Loury / Jancowicz) and creating content around the use of Counter Plaintiff's name, photograph, picture, portrait and/or likeness, to solicit patronage by their fans. Counter Defendant's

CLOUD enterprise most lucrative use of Counter Plaintiffs' name, photograph, picture, portrait and/or likeness, appears to be through Counter Defendant's CLOUD enterprise podcast, on PATREON, wherein Counter Defendant solicits fees from their "patrons" or fans, to access their podcasts, which are principally based on using Counter Plaintiffs' name, photographs, pictures, portraits and/or likenesses, as punching bags, and the basis of their shows, and the content therein.

65. Counter Defendant's CLOUD enterprise used Counter Plaintiff's name, photograph, picture, portrait and/or likeness in numerous ways, to advertise, solicit, and promote their business to tens of thousands of listeners, fans, and consumers; and on a variety of formats, and popular digital platforms, including, but not limited to: PATREON, Facebook, YouTube, Twitter, Periscope, Bit-Chute, SubscribeStar, and countless others.

66. In sum, this is considered "click-bait", or the use of a persona's persona to attract viewers to "click" on the podcast advertisement thumbnail (displayed in Google, LLC and YouTube, LLC search results). The Counter Plaintiff had no relationship to these advertisements in disguise that proclaim viewers should become "patrons" via the PATREON.com, ODYSSEE.com and/or SubscribeStar.com "pay-walls", or metered video content that requires pre-payment via credit card by subscribers.

67. Counter Defendant's CLOUD enterprise operating at the direction of Goodman, under the CrowdSource The Truth trademark, have made purely profit driven commercial video content, transmitted over the Internet wires, with the Counter Plaintiff's likeness available on the PATREON, Odysee and SubscribeStar podcast subscription credit card "pay for view" website. Such commercial content that attempts to establish a non-existent relationship with the Counter Plaintiff does not qualify for the newsworthy privilege exemption.

68. All of these tortious video productions are displayed for view to the general public using an Internet browser to access video podcast content via Internet networked servers that are maintained on-line by entities that operate public social media platforms in the jurisdiction of this Court (e.g. Google, LLC, YouTube, LLC, PATREON, INC, etc.).

69. The foregoing described conduct demonstrates the manner in which the Defendant has violated the privacy of the Counter Plaintiff.

## **SECOND CAUSE OF ACTION**

### **Public Disclosure of Private Facts – against Counter Defendant**

#### **Violations of Right to Privacy and False Light against Counter Defendant**

70. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 69, inclusive, as if fully restated herein.

71. Counter Defendant's CLOUD enterprise, as directed by Agent Goodman, used Counter Plaintiff's name, photograph, picture, portrait and/or likeness, without his written consent, within the state of Michigan and New York, for purposes of advertising or trade. Counter Defendant's CLOUD enterprise use of Counter Plaintiff's name, photograph, picture, portrait and/or likeness, was a use in, or as part of, an advertisement or solicitation for patronage.

72. Counter Defendant's CLOUD enterprise (each of them) published with malice, over the Interstate wires, and republished Counter Plaintiff's name, photograph and/or likeness in multiple formats, including their own promotions and advertisements, websites, social media platforms.

73. Counter Defendant's CLOUD enterprise (each of them) use of Counter Plaintiff's name, photograph, image and/or likeness (violation of privacy and false light) – on countless occasions and in numerous formats - is clearly a recognizable likeness of the Counter Plaintiff and is readily identifiable by someone familiar with him.

74. This tort can be described as, “One who gives publicity to a matter concerning the private life of another is subject to liability to the other for invasion of his privacy, if the matter publicized is of a kind that (a) would be highly offensive to a reasonable person, and (b) is not of legitimate concern to the public.” (Rest.2d Torts, § 652D.)

75. Counter Plaintiff claims that Counter Defendant’s CLOUD enterprise (each of them) violated Counter Plaintiff’s right to privacy by his tortious conduct by the publicized private information concerning the Counter Plaintiff, (false light) that a reasonable person in Counter Plaintiff’s position would consider the publicity highly offensive.

76. That Counter Defendant’s CLOUD enterprise (each of them) acting via their Agent Goodman knew, or acted with reckless disregard of the fact, that a reasonable person in Counter Plaintiff’s position would consider the publicity highly offensive, that the private information was not of legitimate public concern (or did not have a substantial connection to a matter of legitimate public concern).

77. That the Counter Plaintiff was harmed, and that the Counter Defendant’s CLOUD enterprise actions via Agent Goodman’s conduct, acting with actual malice, was a substantial factor in causing Counter Plaintiff’s harm.

78. The Counter Defendant’s CLOUD enterprise (each of them) acting in the scope of its authority, released private information about the Counter Plaintiff that was made public by either communicating said information via social media accounts controlled by the Agent Goodman of the Counter Defendant’s CLOUD enterprise.

79. Such social media accounts to include Twitter, YouTube, PATREON, SubscribeStar, Vimeo, Banned.Video, Facebook, BitChute, Periscope, etc. These social media services were used to obtain

commercial value by the morbid and sensational prying into private life of the Counter Plaintiff for the sake of financial reward.

### **THIRD CAUSE OF ACTION**

#### **Intentional Infliction of Emotional Distress -- Against Counter Defendant**

80. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 79, inclusive, as if fully restated herein.

81. Counter Plaintiff claims that Counter Defendant's CLOUD enterprise (each of them) conduct caused him to suffer severe emotional distress due to the recruitment of "gang stalkers" (sufferers in the search for validation from their peers who desire to replace their unnerving emotion of diffuse fear with a determined and righteous anger) for the purposes of attacking the Counter Plaintiff on social media outlets. That the conduct of the Counter Defendant's CLOUD enterprise (each of them) were in reckless disregard to the probability that Counter Plaintiff would suffer emotional distress, and that the Counter Defendant's CLOUD enterprise (each of them) intended to cause emotional; distress with his outrageous conduct which was a substantial factor in causing Counter Plaintiff's severe emotional distress.

82. The Counter Defendant's CLOUD enterprise (each of them) knew accusations of criminal conduct and fraud upon the court would have a detrimental impact on the Counter Plaintiff's technical business career as a Certified Ethical Hacker, which would cause the Counter Plaintiff to endure angst, anxiety, sleep disturbances and concern over future career opportunities, and published such materials with actual malice.

### **FOURTH CAUSE OF ACTION**

#### **Common Law Tort of Trade Libel – Against Counter Defendants**

83. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 82, inclusive, as if fully restated herein.

84. Counter Plaintiff claims that Counter Defendant's CLOUD enterprise (each of them) via Agent Goodman, acting in his respective personal and business capacities, harmed Counter Plaintiff by making a statement that disparaged Counter Plaintiff's cyber security and critical infrastructure protection skills. The Counter Defendant's CLOUD enterprise (each of them) published statements in a widely disseminated manner across a dozen social media properties that disparaged the ethics, skills, competence and quality of Counter Plaintiff's cyber security and infrastructure protection services. These insinuations, disparagements and slurs were known to the Counter Defendant's CLOUD enterprise to be false, but the Counter Defendant's CLOUD enterprise (each of them) arranged for publication to tens of thousands of viewers, nevertheless, with actual malice.

85. That Counter Defendant's CLOUD enterprise (each of them) knew that these statements and insinuations were untrue; but, acted with reckless disregard of the truth or falsity of these statement, which called out the Counter Plaintiff by his name and likeness, photograph and/or persona which would cause employers and customers in the cyber defense industry to recognize the Counter Plaintiff.

86. That the Counter Defendant's companies (CLOUD enterprise), under the control Agent Goodman, acting in his personal and business capacities, knew or should have recognized that someone else might act in reliance on the statement, causing Counter Plaintiff financial loss; and that the Counter Plaintiff suffered direct financial harm because someone else acted in

reliance on the statements; and that Counter Defendant's CLOUD enterprise conduct was a substantial factor in causing Counter Plaintiff's harm.

87. That such statements were made in video content that appeared on the services YouTube.com, SubscribeStar.com, Odysee.com and PATREON.com and are false advertising creations of the Counter Defendant's CLOUD enterprise facilitated by Agent Goodman acting in his personal and business capacities.

### **FIFTH CAUSE OF ACTION**

#### **False Advertising – Against Counter Defendant**

#### **Violations of Lanham Act, 11 U.S.C. § 1125(a). Section 1125(a)**

88. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 87, inclusive, as if fully restated herein.

89. That the Counter Defendant's CLOUD enterprise (each of them) engaged in the deceptive and false advertising concerning video podcasts available under CrowdSource The Truth brand, which are nothing more than hoax journalism and are not to be considered – in any way – to be truthful. This commercial speech, advertising in disguise, is designed to lure the general public to the PATREON, ODYSEE and/or the SUBSCRIBESTAR page via the use of false, deceptive and misleading advertising. These false misrepresentations are designed to deceive the public at large in New York and Michigan, as a reasonable consumer would assume that fact-checking and vetting is taking place as advertised. In the mind of a reasonable New York and Michigan consumer CrowdSource The Truth is a fact checking truth engine that relies on the crowd to vet facts.

90. The “ABOUT US” definitions of CrowdSource The Truth that appears at <https://www.patreon.com/crowdsourcethetruth> are misleading, deceptive and designed to lure uniformed consumers; quoting in relevant part:

About Crowdsourc The Truth  
Crowdsourc The Truth is an Open Source Fact Checking "Truth Engine" and political social media movement. We gather and disseminate raw intelligence and present it to our constantly expanding network of human brains for vetting, analysis and assessment. Crowdsourc the Truth focuses on examining current events, public policy, history, truth in media and other topics of interest. Members work together to collect and analyze data from around the web and around the world. Together, we will do our best to determine what is fact and what is fiction. Everyone is invited to participate but of course no one is required to. If you see something you disagree with, challenge it with stronger evidence and logic or simply tune it out. This group is an Autocratic Democracy, to borrow some Orwellian doublespeak from those I wish to examine. I run it, but of course if the group dislikes my decisions the project will fail. All decisions will be subjected to group consensus. If anyone doesn't like the direction, please suggest a change or feel free to bow out."

91. The foregoing statement is entirely false and designed to deceptively entice members of the consuming public in New York and Michigan to provide credit card donations (as “patrons”) to the Counter Defendant’s companies (CLOUD enterprise) and Agent Goodman. There is no fact checking, issues are not vetted by the community, there is no examination of “evidence”, etc. The attestation is false and designed to mislead the consuming public.

92. The Counter Defendant’s CLOUD enterprise (each of them) acted in his personal and professional capacities to publish claims they knew to be false, such claims as to a “Truth Engine” were false.

93. Every CrowdSource The Truth video podcast placed on publicly available social media (YouTube, Twitter, FaceBook, Periscope, Bit-Chute, etc.) contains a solicitation to join the

credit card driven PATREON, ODYSEE or SUBSCRIBESTAR fan page. These solicitations are widely disseminated worldwide and to consumers in New York and Michigan. These social media footprints act as advertisement devices, or advertising in disguise. These “teaser” public podcasts entice, lure, and direct the consuming public to become “patrons” on the PATREON fan page. ( <https://www.patreon.com/crowdsourcethetruth> )

94. The Counter Plaintiff has suffered financial hardship as a result of the commercial trade libel and commercial disparagement via the use of the Counter Defendant’s CLOUD enterprise false advertising, which insinuates the Counter Plaintiff is unfit to perform his professional duties as a Certified Ethical Hacker and is engaged in a criminal conspiracy with Richard Lory.

95. These advertisement messages, transported over the Interstate wires, are untrue or misleading, which is known to the Counter Defendant’s CLOUD enterprise, or which by the exercise of reasonable care would have been known, to be untrue or misleading, which were disseminated as part of a plan or scheme with the intent not to provide truthful representations, truthful stories, truthful “crowdsourcing”, etc. The Counter Defendant’s CLOUD enterprise proceeded in reckless disregard of the truth to publish false and misleading information to the consuming public in New York and Michigan.

96. That the foregoing allegations violate the Lanham Act at 11 U.S.C. § 1125(a). Section 1125(a) which creates two distinct bases for liability: false association, and false advertising. The Counter Plaintiff alleges the Counter Defendant and his CLOUD enterprise violated both Lanham Act provisions.

## **SIXTH CAUSE OF ACTION**

### **Violations of the Federal Trade Commission Act, 15 U.S.C. § 45(a) by Counter Defendants**

97. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 96, inclusive, as if fully restated herein.

98. Counter Defendant's M.S.D.I. and 21<sup>st</sup> Century 3D social media properties (CLOUD enterprise) practices as described above constitute deceptive acts or practices in violation of Section 5 of the Federal Trade Commission (FTC) Act, 15 U.S.C. § 45(a). Michigan and New York consumers have suffered, and will continue to suffer, substantial injury as a result of Counter Defendant and his CLOUD enterprise violations of the FTC Act. In addition, Counter Defendant and his CLOUD enterprise has been unjustly enriched as a result of these unlawful acts or practices. Absent injunctive relief by this Court, Counter Defendant and his CLOUD enterprise will likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

99. Acts or practices of the Counter Defendant and his CLOUD enterprise are unfair under Section 5 of the FTC Act as they cause or are likely to cause substantial injury to consumers that consumers cannot reasonably avoid themselves and that is not outweighed by countervailing benefits to consumers or competition. 15 U.S.C. § 45(n). The Counter Defendant's companies (legal fictions) and the CLOUD enterprise utilized their Agent Goodman, acting in a professional and business capacity, to facilitate these actions.

100. The CrowdSource The Truth CLOUD enterprise acts and/or practices in processing fraudulent and unauthorized transactions to consumers' credit card accounts with the intent to defraud, as described in foregoing paragraphs above, have caused or are likely to cause substantial injury to consumers that is not reasonably avoidable by consumers themselves and that is not outweighed by countervailing benefits to consumers or competition. Such injury is the predictable result of the acts or practices described in the paragraphs above.

101. Therefore, the CrowdSource The Truth CLOUD enterprise s acts or practices, as described above, constitute unfair acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. §§ 45(a) and 45(n).

## **SEVENTH CAUSE OF ACTION**

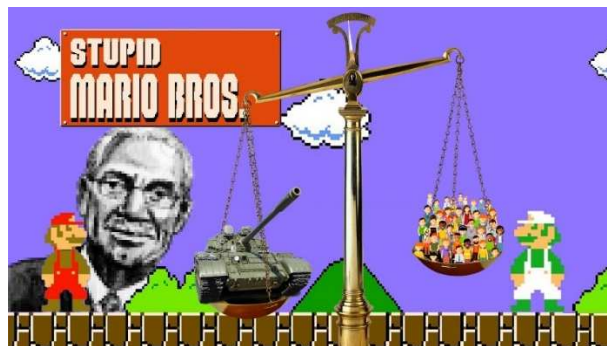
### **Defamation by Implication – Against Defendants CLOUD Enterprise**

102. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 101, inclusive, as if fully restated herein.

103. That the CrowdSource The Truth CLOUD enterprise was used to publish statements and cause statements to be published that are materially false concerning any cooperation on the part of the Counter Plaintiff to assist, participate or collaborate in any scheme to docket forged documents in this Court.

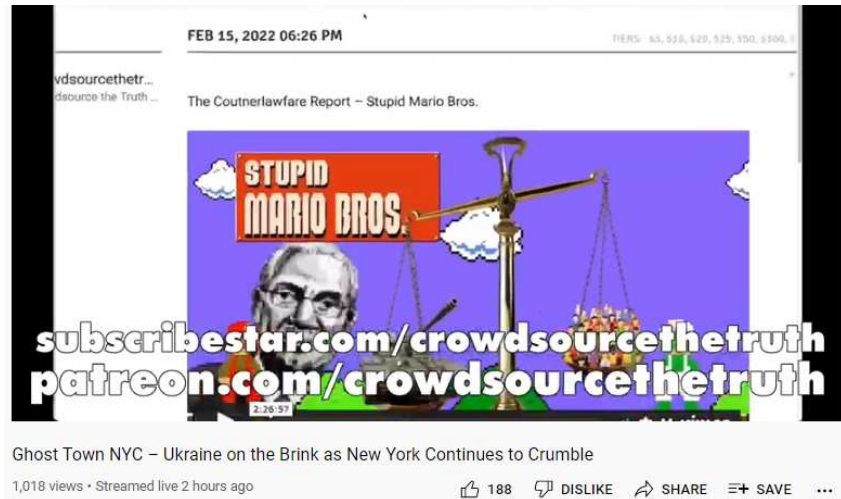
104. The CrowdSource The Truth CLOUD enterprise’s use of “the Sweigert brothers” and the “Super Mario Brothers” in an opened and continuous podcast series indicates the portrayal that somehow the Counter Plaintiff is cooperating with his estranged brother (“Webb”), which the CrowdSource The Truth CLOUD enterprise agents like Goodman know to be false, and have proceeded in reckless disregard to the truth to state otherwise.

105. That the CrowdSource The Truth CLOUD enterprise places content on PATREON, ODYSSEY and SUBSCRIBESTAR under the banner of the COUNTER LAWFARE REPORT which implicates the “Super Mario Brothers” and Richard Lorry in a criminal conspiracy. See below:



<https://twitter.com/csthetruth/status/1493779009854967808>

106. The above Twitter tweet published by the CrowdSource The Truth CLOUD enterprise promotes the COUNTER LAWFARE REPORT on privatized pay-wall credit card channels, as does the YouTube video, shown below, which promotes the same program (featured cartoon of the presiding judge in the M.I.E.D.); entitled, *Ghost Town NYC – Ukraine on the Brink as New York Continues to Crumble*, published Feb. 21, 2022.



<https://www.youtube.com/watch?v=XXIW9QXb3r8>

107. This privatized program (see above) that is advertised on the public video *Ghost Town NYC – Ukraine on the Brink as New York Continues to Crumble* features content concerning the criminal conspiracy by the “Stupid Mario Brothers”. This implicates the Counter Plaintiff in a confabulation with “GEORGE WEBB” concerning a crime, according to the Counter Defendant on his CLOUD enterprise publications, and implicates the Counter Plaintiff in such a crime.

108. Goodman directs people to his COUNTER LAWFARE website, displaying *Goodman v. Bouzy* and “GEORGE WEBB” (SDNY), revealing the identity of a “Super Mario Brother”.



<https://www.youtube.com/watch?v=VQAFqyoliBA>



109. Counter Defendant and his CLOUD enterprise (each of them) published discrete facts in such a way that they create a substantially false and defamatory impression by omitting material facts or juxtaposing facts in a misleading way.

110. Counter Defendant and his CLOUD enterprise (each of them) published these discrete facts by innuendo, and that Counter Defendant and his enterprise intended or knew the implications that the public could draw from the allegedly defamatory material. These statements were published with a reckless disregard to the truth by the Counter Defendant on his enterprise and published with actual malice. The Counter Defendant's enterprise (each of them) intended to convey a false impression that the Counter Plaintiff had violated the Michigan Penal Code.

111. Counter Defendant and his CLOUD enterprise (each of them) acted with negligence and actual malice to distribute these falsehoods. The Counter Defendant and his enterprise's implications that the Counter Plaintiff conspired with Richard Loury or "GEORGE WEBB" are materially false.

112. That Counter Defendant and his CLOUD enterprise (each of them) published statements capable of interpretation by a reasonable listener as stating "actual facts" about the Counter Plaintiff, as opposed to statements of opinion.

## **EIGHTH CAUSE OF ACTION**

### **Vicarious Liability Against Counter Defendant**

113. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 112, inclusive, as if fully restated herein.

114. In all of the tortious acts described in this complaint vicarious liability is imposed upon all CrowdSource The Truth CLOUD enterprise components (each of them). There is a direct causal relationship between the tortious conduct of the CrowdSource The Truth CLOUD enterprise and the Counter Plaintiff's injuries. The CrowdSource The Truth CLOUD enterprise (each of the components) acted as legal entities, M.S.D.I. / 21<sup>st</sup> Century 3D and Agent Goodman. There was actual participation by the sole owner Goodman, using either M.S.D.I. or 21<sup>st</sup> Century 3D, in the tortuous corporate conduct. The sole owner participated in the wrongdoing and/or authorized such conduct and/or directed that such acts described above be done by his corporate proxies (the Counter Defendant's enterprise, each of them). Agent Goodman acted dependently in a manner that serves the interest of the CrowdSource The Truth CLOUD enterprise creating a nexus between the Goodman's corporate responsibilities and the offensive acts described in this Counter Claim Complaint.

115. Although Agent Goodman specifically knew or reasonably should have known that his tortious activity under his control could injure Counter Plaintiff, the CrowdSource the Truth CLOUD enterprise and Agent Goodman negligently failed to take or order appropriate action to avoid the harm as part of his official duties, and in his personal capacities, as an agent of M.S.D.I. / 21<sup>st</sup> Century 3D. An ordinarily prudent person, knowing what the sole owner of the CrowdSource The Truth CLOUD enterprise knew at that time, would not have acted similarly under the circumstances. Therefore, under the doctrine *respondeat superior* liability is imposed upon M.S.D.I. / 21<sup>st</sup> Century 3D.

### **DAMAGES**

116. Counter Plaintiff seeks damages and equitable relief on behalf of himself, which relief includes, but is not limited to, compensatory and punitive damages, an order enjoining Counter Defendant and his CLOUD enterprise (all of them) from the use of the Counter Plaintiff's likeness, name and/or persona in social media podcasts, as well as Counter Plaintiff's future reasonable attorneys' fees and expert fees, and any additional relief that this Court determines to be necessary or appropriate to provide complete relief to Counter Plaintiff.

117. Counter Defendant and his CLOUD enterprise (all of them) acts and conduct have caused damage to Counter Plaintiff and Counter Plaintiff is entitled to recover from Counter Defendant and his CLOUD enterprise the damages sustained by Counter Plaintiff as a result of Counter Defendant and his enterprise's wrongful acts in an amount subject to proof at trial. Counter Plaintiff suffered from fear and confusion, self-doubt, anger, disbelief, shock, gloom, isolation, bewilderment as a direct and in direct of the Defendants enterprise (all of them) actions.

118. Counter Plaintiff seeks an order of this Court awarding damages, restitution, disgorgement, injunctive and/or declaratory relief and all other relief allowed.

. Signed February 9, 2023.



**D. G. SWEIGERT, C/O  
AMERICA'S RV MAILBOX, PMB 13339  
514 Americas Way, Box Elder, SD 57719**

It is hereby certified that all attached exhibits are true and accurate copies of the originals.

I hereby attest that the attached public documents are true and accurate artifacts under the penalties of perjury. Signed February 9, 2023.



**D. G. SWEIGERT, C/O  
AMERICA'S RV MAILBOX, PMB 13339  
514 Americas Way, Box Elder, SD 57719**

# EXHIBITS


EXHIBIT ONE

[https://twitter.com/XposeSTUPIDbros/with\\_replies](https://twitter.com/XposeSTUPIDbros/with_replies)

←

Exposing the Stupid Mario Bros

44 Tweets



Follow

Exposing the Stupid Mario Bros

@XposeSTUPIDbros

Joined January 2010

4 Following 9 Followers

Tweets

Tweets & replies


Media

Likes



Exposing the Stupid Mario Bros @XposeSTUPIDbros · Apr 30

every day is a good day to expose the stupid bros



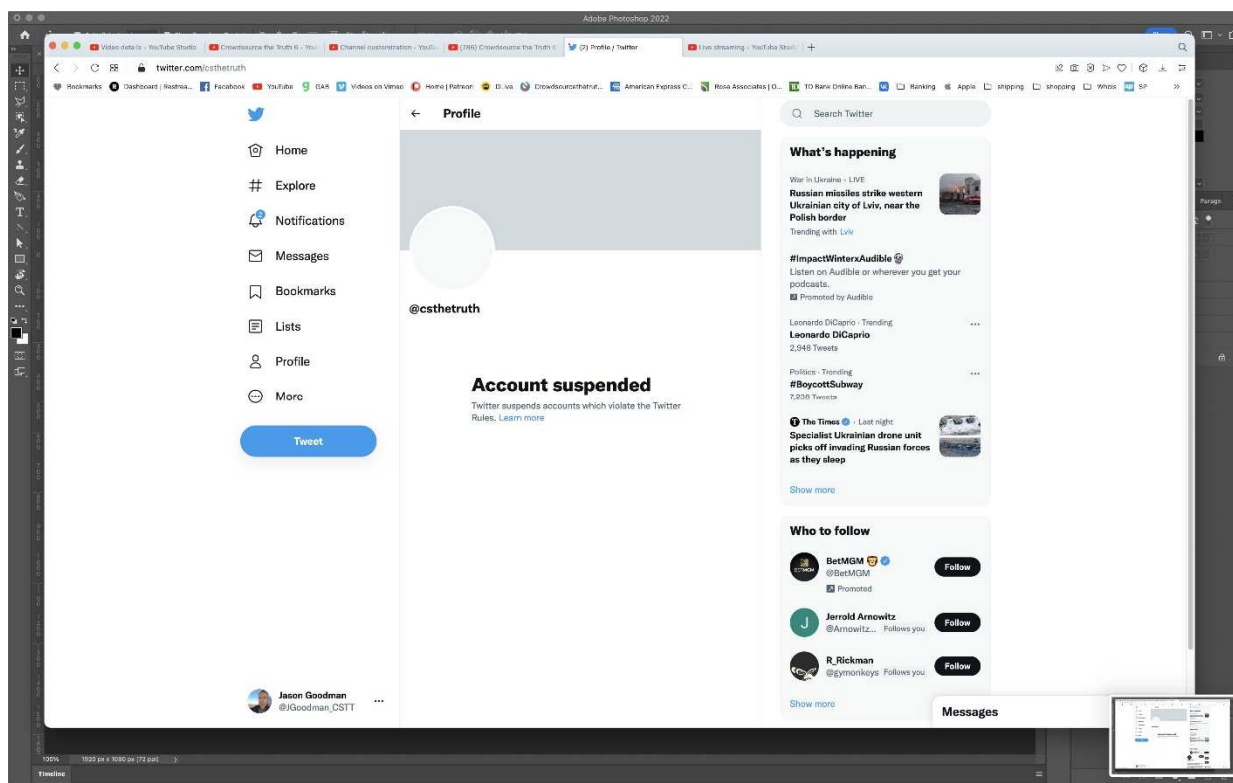
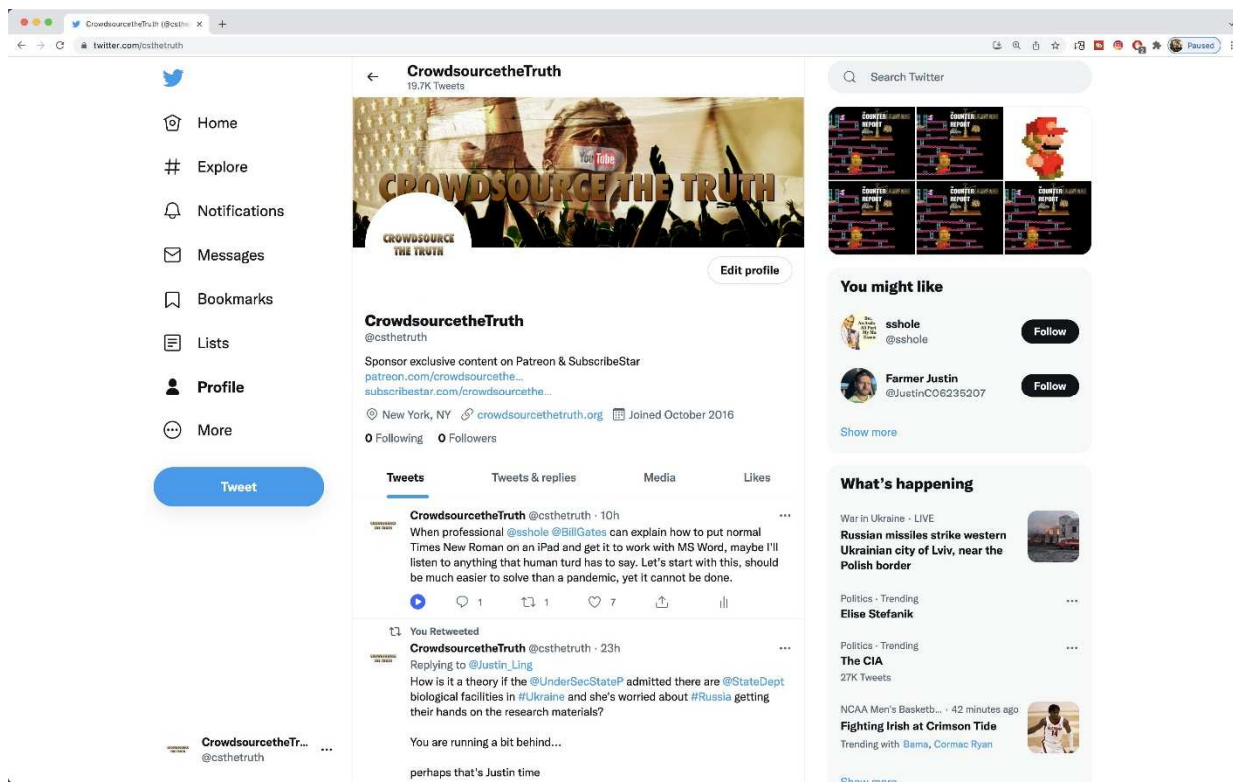
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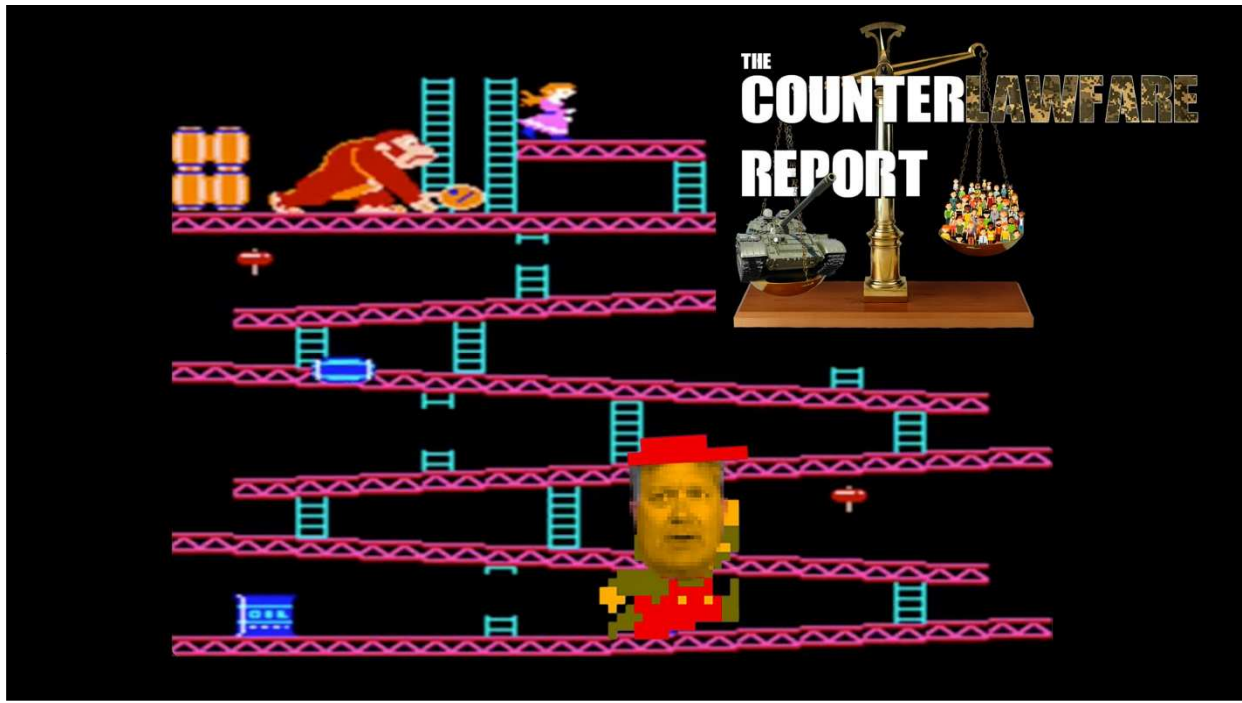
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❤️

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File 1: Uploaded as  
"SweigertVCNNDrainSummons\_PDF\_  
fillable2021.pdf", saved and attached  
as "File\_1\_ProSe\_20210617\_16\_11\_  
34\_270.pdf"  
Description: Summons Request

On Thu, Jun 17, 2021 at 4:07 PM [REDACTED]  
[REDACTED] <[REDACTED]>  
wrote:

Mr. Sweigert,

We have not received the document through  
the Temporary Pro Se Document Upload  
Program. We can not issue the Summons  
until you correctly submit the document.

Best,

[REDACTED]

Pro Se Case Administrator

U.S. District Court - Eastern District of  
Michigan

Direct Phone: (313) 234-5013

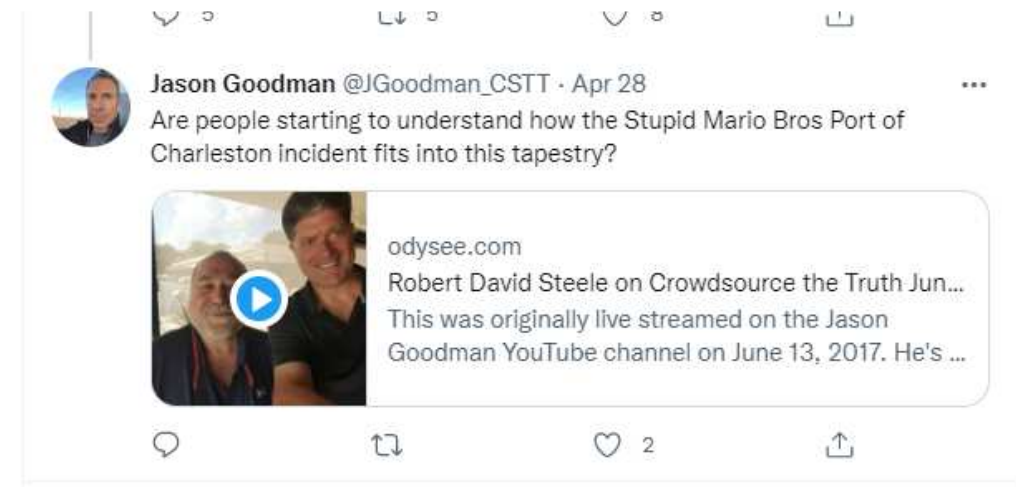
[\[REDACTED\]](#)

**EXHIBIT TWO**

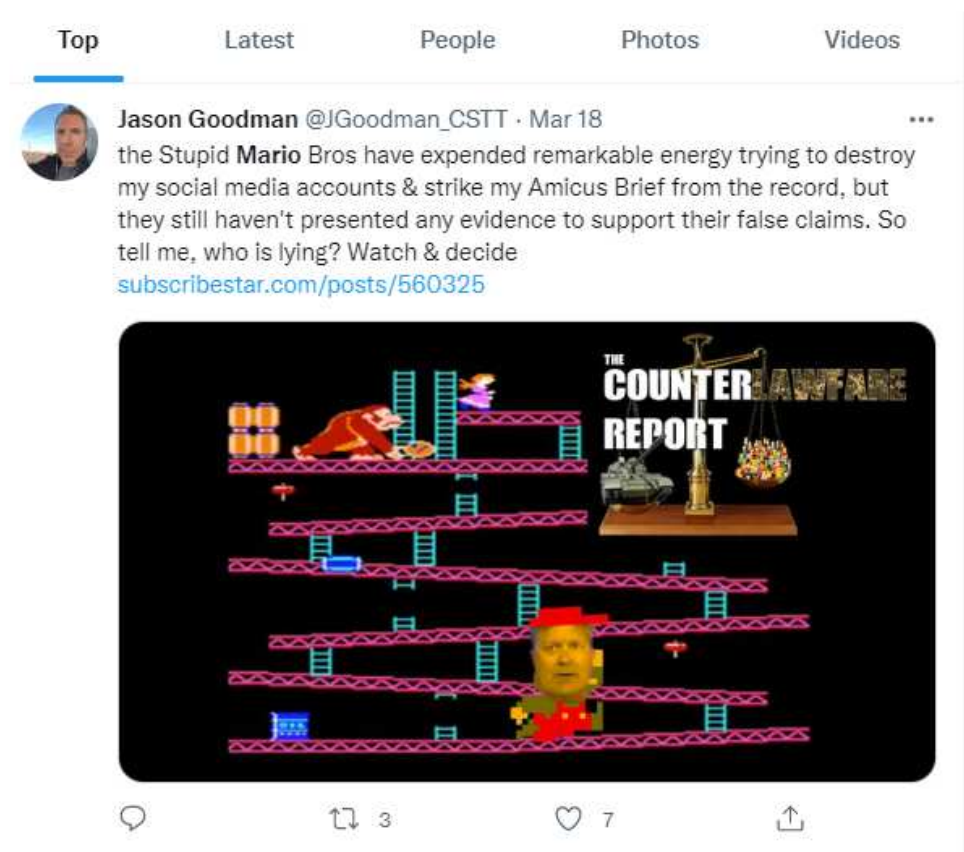
**[https://twitter.com/JGoodman\\_CSTT](https://twitter.com/JGoodman_CSTT)**



[https://twitter.com/JGoodman\\_CSTT/status/1519649224706637825](https://twitter.com/JGoodman_CSTT/status/1519649224706637825)



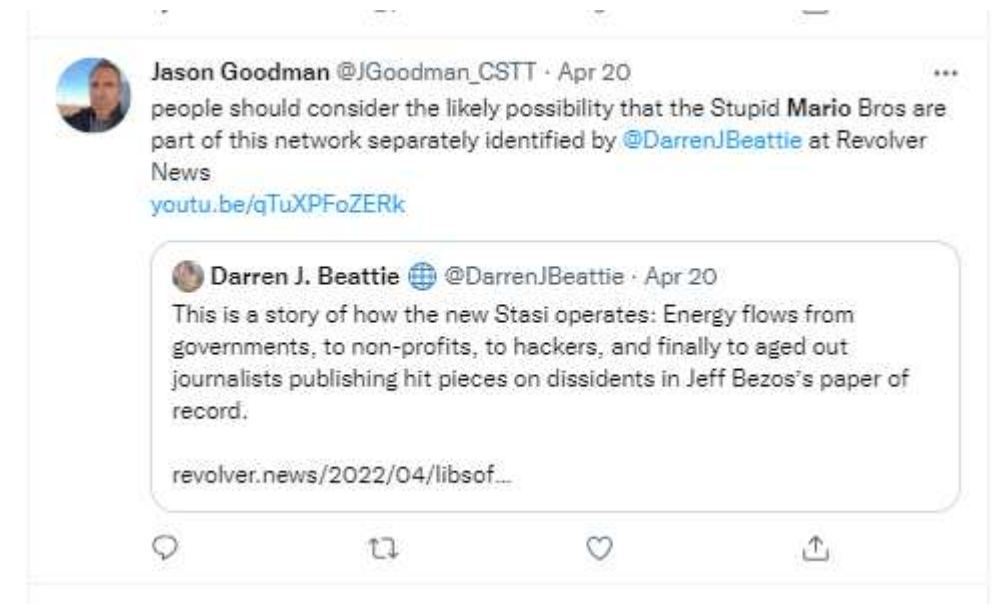
[https://twitter.com/JGoodman\\_CSTT/status/1504954872273285126](https://twitter.com/JGoodman_CSTT/status/1504954872273285126)



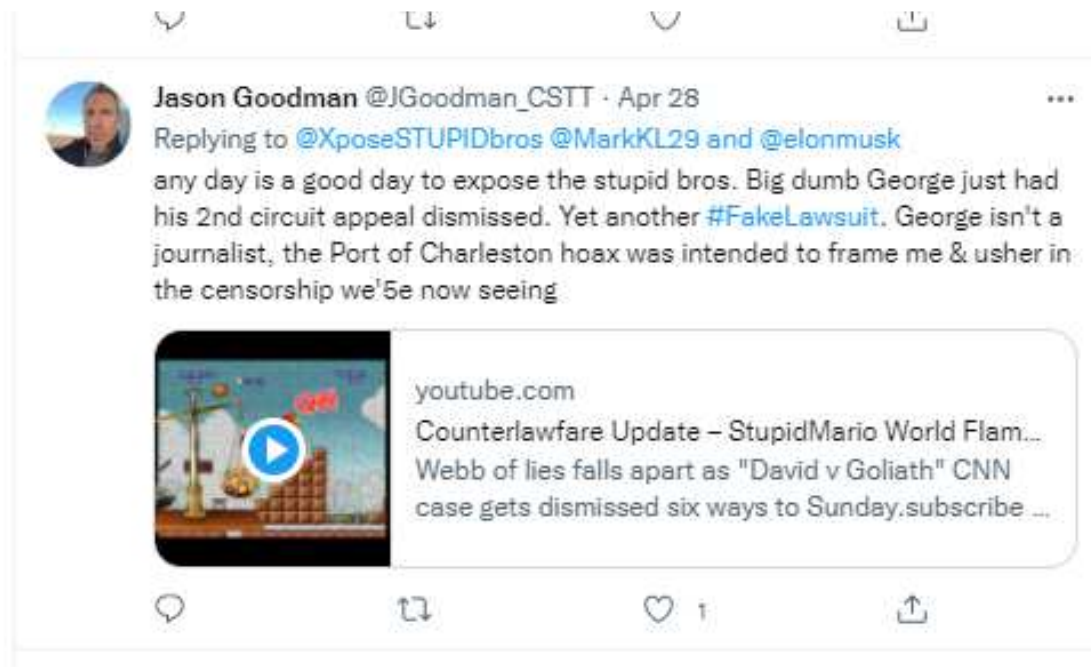
[https://twitter.com/JGoodman\\_CSTT/status/1516050190314221570](https://twitter.com/JGoodman_CSTT/status/1516050190314221570)



[https://twitter.com/JGoodman\\_CSTT/status/1516797415902302214](https://twitter.com/JGoodman_CSTT/status/1516797415902302214)



[https://twitter.com/JGoodman\\_CSTT/status/1519798730379169793](https://twitter.com/JGoodman_CSTT/status/1519798730379169793)




[https://twitter.com/JGoodman\\_CSTT/status/1503831461341900806](https://twitter.com/JGoodman_CSTT/status/1503831461341900806)



<https://twitter.com/XposeSTUPIDbros/status/1509641726557839370>





**Jason Goodman**  
 793 Tweets





Follow




**Jason Goodman** @JGoodman\_CSTT · 2h  
 George Webb & his reprehensible brother are actively working to get [@OdyseeTeam](#) removed from the internet. These subversive operators are un-American enemies of free speech & should be jailed. Watch the Counterlawfare Report [subscribestar.com/crowdsourcethe...](#) [patreon.com/crowdsourcethe...](#)


You reported this Tweet.

View





 1
 
 1
 



**Jason Goodman** @JGoodman\_CSTT · 2h  
 don't email me saying GW is a journalist, he's a dangerous liar & he's part of the effort to destroy the U.S. Constitution & America itself. He's said in his own words he would always protect [@BarackObama](#) [#traitor](#) lots of unflattering evidence on Odysee



[odysee.com](#)  
 Getting the Big G out of the Big House v2 (original...  
 As everyone now knows, intrepid investigator George Webb was arrested on June 15, 2017 under...



 1
 

**EXHIBIT THREE**

<https://www.youtube.com/watch?v=qTuXPFoZERk>



[Crowdsourcethe Truth 5](#)

Crowdsourcethe Truth 5

10K subscribers

SUBSCRIBED

Webb of lies falls apart as "David v Goliath" CNN case gets dismissed six ways to Sunday.

subscribe to Crowdsourcethe Truth on Rumble - <https://rumble.com/user/csthetruth> subscribe to

Crowdsourcethe Truth on Odysee - <https://odysee.com/@Crowdsourcethetruth> Please sponsor the

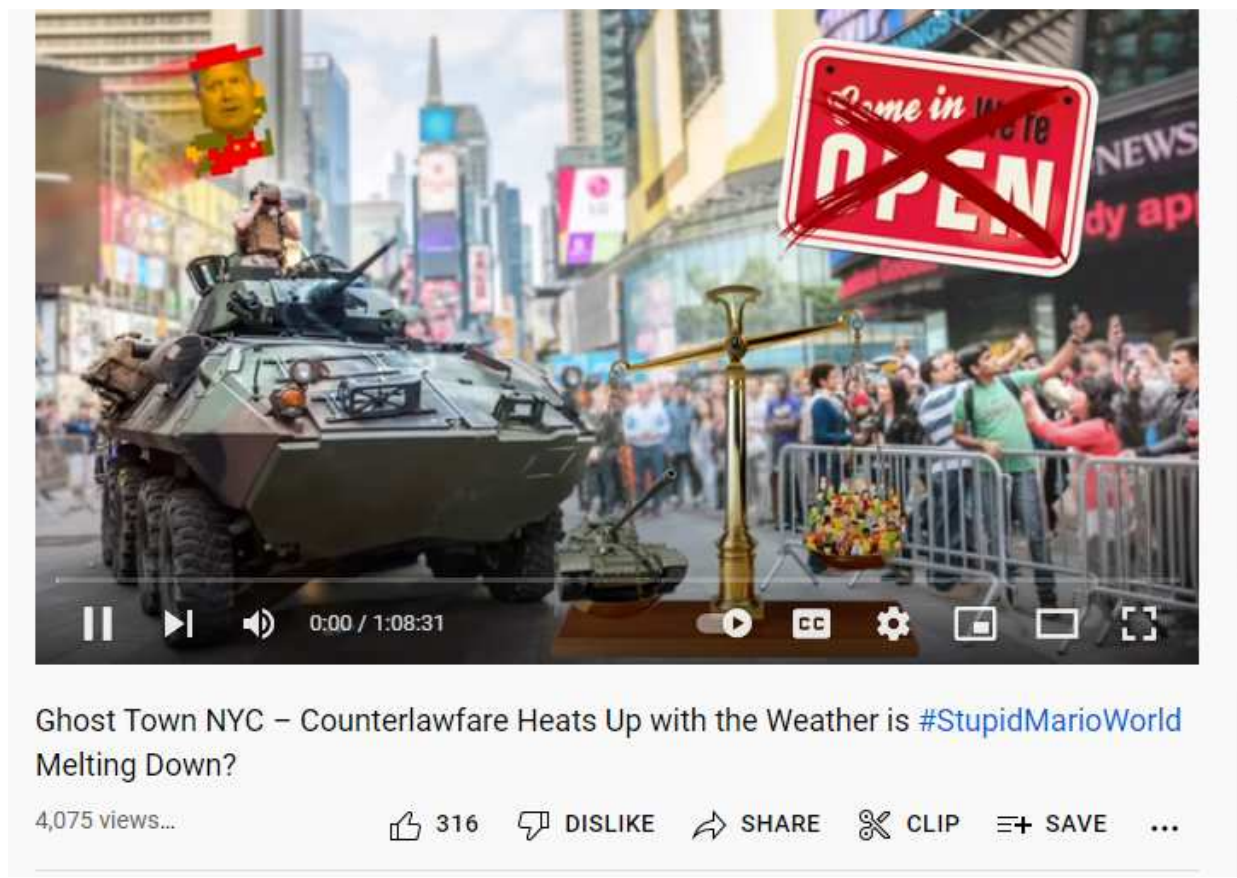
Crowdsourcethe Truth Counterlawfare Fund at <http://www.crowdsourcethetruth.com>. Become a

sponsor & enjoy exclusive content on SubscribeStar & Patreon Get a FREE 3-Day trial at

<http://www.subscribe.com/crowdsou...> <http://www.patreon.com/crowdsourcethe...>

<http://paypal.me/crowdsourcethetruth> Visit <http://www.crowdsourcethetruth.com>

<https://www.youtube.com/watch?v=hrPfebLivPI>



[Crowdsource the Truth 5](#)

Crowdsource the Truth 5

10K subscribers

SUBSCRIBED

[#NYC #Lawfare #StupidMarioBros](#) An amended Amicus Curiae Brief has dropped like a MOAB on the docket in Detroit sending shockwaves through Stupid Mario World.

The weather is warming up as some people face the real possibility of jail. subscribe to Crowdsource the Truth on Rumble - <https://rumble.com/user/csthetruth> subscribe to Crowdsource the Truth on Odysee - <https://odysee.com/@Crowdsourcethetruth...> Please sponsor the Crowdsource the Truth Counterlawfare Fund at <http://www.crowdsourcethetruth.com>. Become a sponsor & enjoy exclusive content on SubscribeStar & Patreon Get a FREE 3-Day trial at <http://www.subscribestar.com/crowdsou...> <http://www.patreon.com/crowdsourcethe...>

**EXHIBIT FOUR**

**<https://twitter.com/GHenryDickface>**





<https://twitter.com/GHenryDickface/status/1519312008390270978>



GeorgeHenryDickface  
@GHenryDickface

...

CIA Dave Acton court testimony



odysee.com

CIA Dave Acton court testimony George Webb part1of2  
View CIA Dave Acton court testimony George Webb part1of2  
on Odysee

6:46 AM · Apr 27, 2022 · Twitter Web App

**EXHIBIT FIVE**



**<https://twitter.com/counterspiliat1>**



**<https://twitter.com/cheburashka1964>**



<https://twitter.com/csthetruth>

**EXHIBIT SIX**

**DECLARATION OF PRO SE COUNTER PLAINTIFF**

119. The pro se Counter Plaintiff undersigned hereby states under the penalties of perjury that:

120. Contrary to the public declarations of Jason Goodman (“Goodman”) the undersigned does not maintain a collaborative relationship with his brother George Webb Sweigert (“Webb”).

121. Mr. Goodman has received copies of electronic messages sent to a wide variety of interested parties, to include Webb, under the auspices of litigation privilege in an attempt to encourage Goodman to cease his non-stop defamatory remarks appearing in social media podcasts concerning the undersigned.

122. To this end, the undersigned has never authored or ghost-written legal documents for Webb regarding any litigation within the U.S. District Court serving the Eastern District (M.I.E.D.) or in any other forum.

123. To this end, the undersigned has never entered the PRO SE ECF docket upload system as Webb, nor has uploaded documents on behalf of Webb, nor has fashioned documents for such an upload, not has created documents for such an upload.

124. Likewise, the undersigned knows nothing about interactions between Webb and M.I.E.D. employee Richard Louri (“Louri”), neither has the undersigned had interactions with Louri – except to include his e-mail address on messages which Goodman received as well.

125. To this end, the undersigned never collaborated with Loury concerning the uploading of any documents to the M.I.E.D. ECF PRO SE web portal, nor has fashioned any documents with the help of Loury or in communications with Loury.

126. The booklet known as the Certified Ethical Hacker's Field Operations Guide, authored by the undersigned, contains only one reference to an Adobe PDF file which appeared in the Uniform Resource Location (URL) of an Internet web address within the book. Otherwise, there is no discussion of Adobe PDF files in this book.

127. The undersigned is "not a professional hacker", as claimed by Goodman, but maintains the U.S. Department of Defense (DoD) recognized training credential Certified Ethical Hacker as defined by DoD Manual 8570.

128. The undersigned does not engage in any unauthorized access to any computer systems anytime and/or anywhere. "Hacking" is a term of art that indicates unauthorized access to a computer system or network. There are professional implications to being associated with the label "professional hacker", and such association has harmed the professional image of the undersigned.

129. The undersigned is aware that on July 20, 2021, Goodman filed an Amicus Curiae brief in support of defendant CNN's motion to dismiss in the M.I.E.D. (*See* Case 2:20-cv-12933-GAD-KGA ECF No. 20).

130. The undersigned denies that this Amicus Curia brief, nor it's amendment, presented evidence that suggests Webb and the undersigned conspired with a clerk of the court, Loury, to cause a fraudulent document to be filed on the docket, in violation of 18 U.S. Code § 1343, to attribute such document to Webb, but authored by Loury, and which outside the normal procedure of the M.I.E.D., as alleged by Goodman. The undersigned has no knowledge in such

matters and did not participate in this alleged conspiracy to create documents for the M.I.E.D. ECF docket..

131. The undersigned knows of no dynamic online collective which operates to harm Goodman except for personalities mentioned by Goodman during video broadcasts in 2017 to 2019 to include “DEFANGO”, Manuel Chavez, III of Carson City, Nevada, the wife of the attorney representing Steele in the Virginia legal actions, an apparent brother-in-law of the same attorney known as “Tyrone Simpson” apparently of New Mexico or Colorado. This clique was heavily reported on by Goodman in his broadcasts during the 2017 to 2019 period. The undersigned is not a member of this clique.

132. The undersigned does not, and has never coordinated a “Cyber Militia” force to consolidate any attacks on Goodman. The undersigned has written about the concept of a Cyber Militia in scholarly papers published in the 2013-time frame. The undersigned discussed the general concept of a Cyber Militia in two or three videos that were broadcast in the summer of 2017. The videos were designed to present scholarly research to a limited audience with an interest in such matters.

133. The undersigned is familiar with the concept of “mass reporting” from a large number of inauthentic social media accounts to create the false impression of public outrage and prompt. However, the undersigned has not organized or participated in such campaigns against Goodman.

Signed this 9<sup>th</sup> day of February, 2023



**D. G. SWEIGERT PRO SE, C/O  
PMB 13339, 514 Americas Way,  
Box Elder, SD 57719**

[Spoliation-notice@mailbox.org](mailto:Spoliation-notice@mailbox.org)

Hereby signed on February 9<sup>th</sup>, 2023



**D. G. SWEIGERT PRO SE DEFENDANT, C/O**  
**PMB 13339, 514 Americas Way, Box Elder, SD 57719**

**It is hereby certified under the penalties of perjury that a true copy PDF file has been sent via e-mail message to the following:**

---

Jason Goodman, sole stockholder of MULTIMEDIA SYSTEM DESIGN, INC.

[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)

And

[Georg.webb@gmail.com](mailto:Georg.webb@gmail.com)

[berlins@ballardspahr.com](mailto:berlins@ballardspahr.com)

[mishkinm@ballardspahr.com](mailto:mishkinm@ballardspahr.com)

[margaret.esquenet@finnegan.com](mailto:margaret.esquenet@finnegan.com)

[liz.lockwood@alilockwood.com](mailto:liz.lockwood@alilockwood.com)

Certified under penalties of perjury.

Signed this 9<sup>th</sup> day of February 2023.



**PRO SE DEFENDANT**